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INTRODUCTION AND GENERAL DESCRIPTION OF PLANT

1.1 INTRODUCTION

This Post-Defueling Monitored Storage (PDMS) Safety Analysis Report (SAR) is submitted in support of the application of GPU Nuclear Corporation (GPU Nuclear) as agent for Metropolitan Edison Company (Met-Ed), Jersey Central Power & Light Company (JCP&L), and Pennsylvania Electric Company (Penelec) for revision of the existing Class 103 license to delineate the non-operating status of the nuclear electric generating station designated as Three Mile Island Nuclear Station Unit 2 (TMI-2). There are various sections of this SAR which reference either the Unit 1 USAR or Unit 2 FSAR for relevant information. These refer to information which has been previously reviewed and approved by the NRC, remains valid, and does not require further review. The TMI-1 USAR will continue to be updated in accordance with 10 CFR 50.71(e) whereas the TMI-2 FSAR update is no longer required.

The Three Mile Island Unit 2 operating license was issued on February 8, 1978, and commercial operation was declared on December 30, 1978. On March 28, 1979, the unit experienced an accident which resulted in severe damage to the reactor core. TMI-2 has been in a non-operating status since that time. GPU Nuclear has been conducting a substantial program to defuel the Reactor Vessel and decontaminate the facility. As a result, TMI-2 has been defueled and decontaminated to the extent that the plant is in a safe, inherently stable condition suitable for long-term management and any threat to the public health and safety has been eliminated. This long-term management condition is termed Post-Defueling Monitored Storage.

1.1.1 POST-DEFUELING MONITORED STORAGE

Post-Defueling Monitored Storage has been established at this time based on three principal considerations:

- 1. The Reactor Vessel and the Reactor Coolant System have been defueled and the core material has been shipped off-site.
- Decontamination has been completed to the extent that further major decontamination programs are not justified on the basis of worker dose.
- A condition of stability and safety has been established such that there is no risk to public health and safety.

These three criteria are interrelated in that each has some degree of dependence on the other. A significant amount of decontamination had to be completed prior to the beginning of defueling. As defueling progressed and was completed, further decontamination tasks were undertaken

which allowed for the completion of other cleanup activities. Extensive decontamination and the completion of defueling were required to establish the inherently stable and safe condition of the facility such that there was no risk to public health and safety.

Although it would be possible to continue decontamination of the facility, this effort would not appreciably enhance the overall stability and maintainability of the facility nor would it add to the overall margin of safety for the public. However, additional decontamination at this time would result in unnecessary additional occupational exposure to personnel who would be conducting the decontamination tasks. In addition, further decontamination might require some destructive decontamination techniques which would be best conducted when the plant is decommissioned. By placing TMI-2 in a long-term monitored storage condition at this time (i.e., until the time of decommissioning of TMI-1), it is possible to realize a significant savings in occupational exposure by deferring remaining decontamination activities for a number of years. For example, assuming all other factors to be equal, natural decay of the dominant radioactive isotopes (Sr-90, Cs-137) over a 30-year period would result in the occupational exposure being reduced by a factor of approximately two for any given task. It is possible that additional reductions in occupational exposure also could result from advances in decontamination technology and robotics. Although the exact reductions in occupational exposure are extremely difficult to quantify, it is clear that postponement of the remaining pre-decommissioning decontamination activities will result in a significant savings in occupational exposure. A preliminary estimate indicated that a savings of approximately 4300 person-rem would result from the deferral of remaining decontamination activities. This estimate was based on information published by the NRC in Supplement 1 to the Programmatic Environmental Impact Statement (PEIS) and adjusted to account for variations in the scope of the work and actual exposure experience during the cleanup.

Based on this preliminary analysis and using revised data, GPU Nuclear, in 1985, more accurately quantified the potential savings in occupational exposure due to the deferral of the remaining decontamination tasks. The results of this extensive effort are presented in Appendix 1A. Given that occupational exposure remains the singular contributor to environmental impact, avoidance of unnecessary exposure where the public health and safety are not at risk is appropriate.

1.1.2 TRANSITION TO POST-DEFUELING MONITORED STORAGE

The formal transition from the current post-accident condition to PDMS required NRC approval and implementation of the enclosed license revision proposed by GPU Nuclear. The establishment of the actual PDMS condition occurred over a period of time preceding the formal implementation of PDMS and extending into PDMS. Not all activities leading to the final PDMS configuration must be completed prior to the implementation of PDMS. However, during the transition period, all of the prerequisites to PDMS were satisfied. The following sections outline those conditions which were established prior to the implementation of PDMS and those activities which extended for some period of time subsequent to PDMS

implementation.

1.1.2.1 Prerequisites for PDMS

The following prerequisites were satisfied prior to the implementation of PDMS.

- 1. It has been demonstrated that there is no credible possibility of nuclear criticality. This condition has been assured by the removal of substantially all of the fuel from the Reactor Vessel and elimination of all potentially critical configurations. The elimination of any credible possibility of nuclear criticality was demonstrated as a requirement for transition to Mode 2 in accordance with the TMI-2 Recovery Technical Specifications. A report supporting this condition was submitted to the NRC.
- All fuel and core debris which have been removed from the Reactor Vessel and associated systems have been shipped off-site.
- 3. Any potential for a significant release of radioactive material has been eliminated. Radioactive material has been removed and other sources of radioactivity have been isolated so that any potential radioactive release will be within 10 CFR 50 Appendix I guidelines for off-site dose consequences.
- 4. As a precondition to implementing PDMS, water has been removed to the extent practical from the Reactor Coolant System and the Fuel Transfer Canal, and the fuel transfer tubes have been isolated. To the extent that the Spent Fuel Pools are needed to support Accident Generated Water disposal activities, water may remain in these pools subsequent to the implementation of PDMS. The treatment and processing of the Accident Generated Water is discussed in Section 1.1.3.
- All radioactive waste from the major cleanup activities has been shipped off-site or has been packaged and staged for shipment off-site.
- Radiation within the facility has been reduced, as necessary, consistent with As-low-as-isreasonably-achievable (ALARA) principles to levels which will allow necessary plant monitoring activities, the performance of required maintenance, and any necessary inspections.

1.1.2.2 Transition Activities

Although the conditions described in Section 1.1.2.1 were established prior to the implementation of PDMS, there were some conditions described in this SAR which were not essential to the implementation of PDMS and the related activities were conducted subsequent to the implementation of PDMS. A general description of some of those activities and conditions follows.

- Decontamination During the initial stages of PDMS, removal or isolation of small sources of radioactivity or radioactive material will be ongoing.
- Radioactive Waste Small quantities of radioactive waste will continue to be generated, accumulated, and packaged during PDMS. Thus, radioactive waste shipments will continue during PDMS.
- 3. PDMS Electrical Modification The TMI-2 PDMS Electrical Modification results in a safer, more reliable power system than the system existing during Facility Mode 3. Although many electrical loads were eliminated during PDMS preparation, this modification further consolidates loads to produce a simpler, easier to maintain electrical power system. The PDMS Electrical Modification is scheduled to be completed in the second quarter 1994.
- 4. Cork Seam The TMI-2 cork seam is a cork-filled construction joint located between the various major structures at TMI-2 (See Figure 1.1-1). During the TMI-2 accident, the cork seam located the Auxiliary Building Seal Injection Valve Room (SIVR) was contaminated with adioactive water. Since the accident, radioactive material has spread along the joint in one direction into the Annulus, and in the other direction into the Auxiliary Building, Service Building and Control Building Area. The radioactive contamination is prevented from entering the ground water table by a PVC waterstop and thus represents no breat to the health and safety of the public.

Core boring holes were made in the M-20 and Auxiliary Building areas of the seam (Figure 1.1-1, Holes S2 and S6); cork and water samples were extracted from these holes. The M-20 area was found not to be contaminated. The data retrieved from the Auxiliary Building hole (S6) was analyzed; it was determined that the 40-year Total Integrated Dose (TID) to the PVC waterstop in this area would be 6.4E5 rads. This is less than 5% of the dose that would cause degradation of the material.

Additional work will be performed on the cork seal prior to and shortly after entry into PDMS (See Figure 1.1-1). A core bore will be drilled in the cork seam in the Control Building Area and a dam installed to prevent contamination in the seam from spreading into the M-20 area, which is presently not contaminated. Another core bore will be drilled in the cork seam in the Auxiliary Building between the existing dam and the Auxiliary/Service Building wall and a dam installed to prevent further contamination spread into the Service/Control Building Area. Prior to installing the new dam at this location, the contaminated water in the seam will be pumped out into a receiving tank, sampled, and then transferred to the plants' Radioactive Water Storage System, pending future processing operations. This water removal process will be performed from this new hole, the S6 hole, and any other holes that may be deemed necessary. The need for further drilling and dam installation at the two locations (S4 and S5) noted on Figure 1.1-1 will then be determined.

After the water removal process has been completed, a liquid-level monitoring device will be inserted in each of the four sections in the one-inch diameter holes (S2, S6, S7, and S8). At least monthly, for a period of one year, these holes will be monitored for water entering the seam. The monitoring program will be reevaluated after the initial one year period. Finally, after the dams and pumping/monitoring holes are installed and the water is removed, an evaluation will be performed to determine whether additional actions are required, e.g., removal of cork material or capping of the cork seam.

TMI-2 has been maintained in a safe, monitored condition throughout the transition period prior to PDMS, and will be maintained accordingly following implementation of PDMS even though some transition activities are ongoing. A commitment tracking process has been established to verify the status and completion of all activities performed in preparation for PDMS and during the PDMS transition period to ensure all required activities described in this SAR are completed.

1.1.3 APPLICABLE REGULATIONS

GPU Nuclear is requesting an amended facility license for TMI-2 in accordance with the provisions of Title 10 to the Code of Federal Regulations, Part 50 (10 CFR 50). The provisions of 10 CFR 50, as established, were intended to be applicable to an operable nuclear power plant. For this reason, many of the requirements originally imposed on TMI-2 no longer apply or can be substantially reduced in scope because of the status of TMI-2 during PDMS. Because nuclear criticality has been precluded with removal of substantially all of the fuel from TMI-2, and because radiation hazards have been substantially reduced due to the immobilization of essentially all of the radioactivity remaining in the plant, many systems, structures, and components are no longer required and the regulations governing these systems, structures, and components have a significantly reduced scope of applicability at TMI-2.

In order to assure compliance with the appropriate requirements of the regulations in 10 CFR 50, a thorough review of these regulations was undertaken. Chapter 3 of this SAR presents the results of that review and serves as the basis for determining which regulations have a controlling impact on TMI-2.

The determination of applicability does not suggest that some regulations can be ignored. Rather, the intent of some regulations can be met with no impact or additional requirements imposed due to the PDMS status of TMI-2.

1.1.4 SAFETY-RELATED STRUCTURES, SYSTEMS, AND COMPONENTS

There are no structures, systems, or components classified as safety-related at TMI-2 during PDMS. GPU Nuclear procedures define safety-related structures, systems, and components as those which are necessary to ensure:

- a. The integrity of the reactor coolant pressure boundary,
- b. The capability to shutdown the reactor and to maintain it in a safe shutdown condition, or
- c. The capability to prevent or mitigate the consequences of accidents which could result in potential off-site exposures comparable to the guidelines exposures of 10 CFR Part 100.

Criterion a requires maintenance of the reactor coolant pressure boundary. Due to the defueled condition of TMI-2, there is no reactor coolant or reactor coolant pressure boundary required.

Criterion b requires a capability to shutdown the reactor and maintain it in a safe shutdown condition. In its current defueled state, there are no structures, systems, or components required to maintain a safe shutdown condition.

Criterion c requires a capability to prevent or mitigate the consequences of accidents that could result in potential off-site exposures comparable to the 10 CFR Part 100 guidelines. Analysis demonstrates (see Chapters 4 and 8) that there are no postulated events that result in releases greater than 10 CFR 50 Appendix I guidelines. Since 10 CFR 50 Appendix I is more restrictive, there are no postulated events which could result in exposures comparable to 10 CFR Part 100 guidelines.

Due to the non-operating and defueled status of TMI-2 during PDMS, there are no structures, systems, or components which are required to meet the safety-related criteria. Therefore, there are no structures, systems, or components classified as safety-related at TMI-2 during PDMS.

1.1.5 DEVELOPMENT OF ACCEPTABLE OFF-SITE DOSE CRITERIA

Various regulations establish permissible limits for off-site radiation exposures resulting from the operation of licensed nuclear reactors and other nuclear fuel cycle activities. These regulations include 10 CFR 20, 10 CFR 50 Appendix I, 10 CFR 100, 40 CFR 190, and the EPA Protective Action Guidelines. The licensing basis for off-site dose criteria for PDMS has been derived from these existing regulations and applicable precedents. Specifically, 10 CFR 50 Appendix I, which is recognized as demonstrably safe with respect to radiological implications, has been established as the PDMS standard. A small fraction (i.e., less than 10%) of the Appendix I off-site dose guidelines is expected to be maintained for normal conditions prevailing

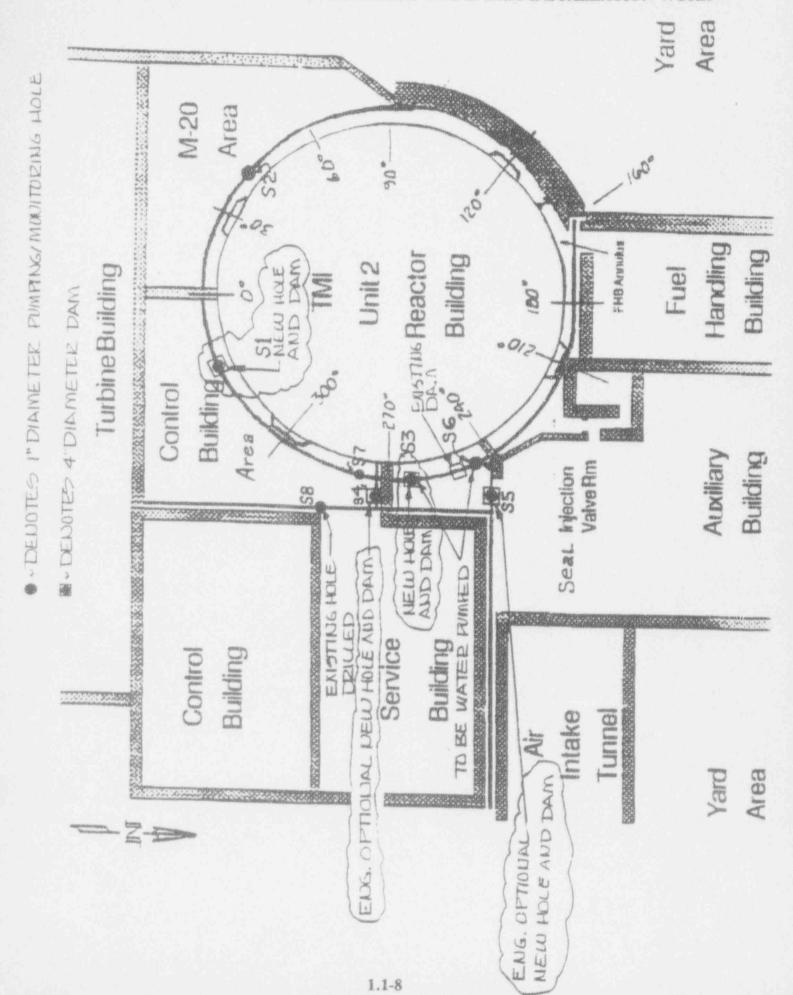
during PDMS. The potential off-site radiological doses resulting from postulated off-normal conditions will be within the 10 CFR 50 Appendix I guidelines.

Due to the non-operating and defueled status of TMI-2, a major radiological release approaching the guidelines of 10 CFR 100 is no longer credible. As noted above, Appendix I guidelines have been selected as the limiting criteria for the evaluation of unanticipated events as an unarguable, demonstrably, conservative basis. This ultra-conservative approach far exceeds the regulatory limits for unanticipated events in operating nuclear power plants.

1.1.6 RELATIONS OF THIS PDMS SAR TO THE EXISTING UNIT 1 USAR AND UNIT 2 FSAR

This PDMS SAR makes reference to relevant portions of the Unit 1 USAR or the Unit 2 FSAR. The TMI-1 USAR will continue to be updated annually as required, and the updated document will be applicable for those changing site-related conditions that have a bearing on TMI-2. The TMI-2 FSAR will not be updated but will continue to be applied as appropriate to TMI-2 in the PDMS condition. In particular, the bounding conditions in the TMI-2 FSAR as augmented by the PDMS SAR will be used to judge the acceptability of changes, tests, and experiments and the attendant determination of unreviewed safety questions. The TMI-2 FSAR also applies for those areas not addressed by this PDMS SAR.

FIGURE 1.1-1
HOLE DRILLING AND DAM INSTALLATION WORK



1.2.8 FACILITIES AND SYSTEMS RELEASED FOR SITE USE

As a result of the accident, unique situations developed which could not be properly managed with the existing facilities or systems which were designed for normal operating power plant use. Several systems were designed and fabricated to process the radioactive wastes resulting from cleanup activities. Upon completion of cleanup activities, several of these facilities were released to general site use (and included under the TMI-1 license). These systems and facilities include:

- 1. Auxiliary Building Emergency Liquid Cleanup (EPICOR II)
- Waste Handling and Packaging Facility
- 3. Interim Solid Waste Storage Facility
- 4. Solid Waste Staging Facility
- 5. Respirator Cleaning and Laundry Maintenance Facility
- 6. Solid Waste Storage Building

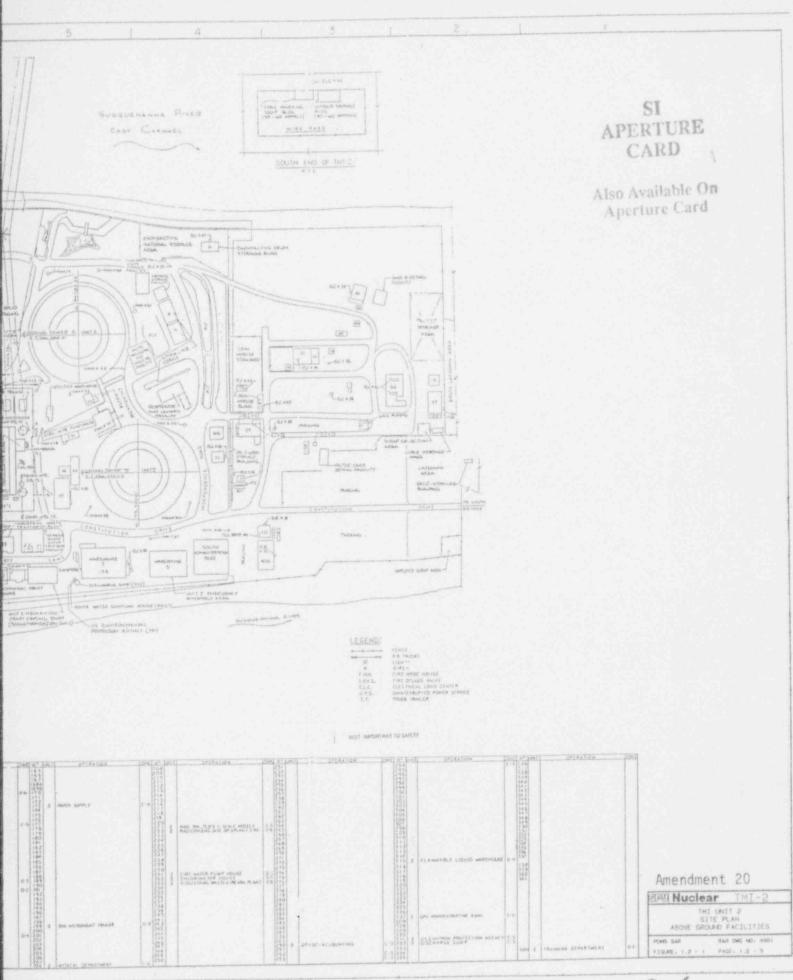
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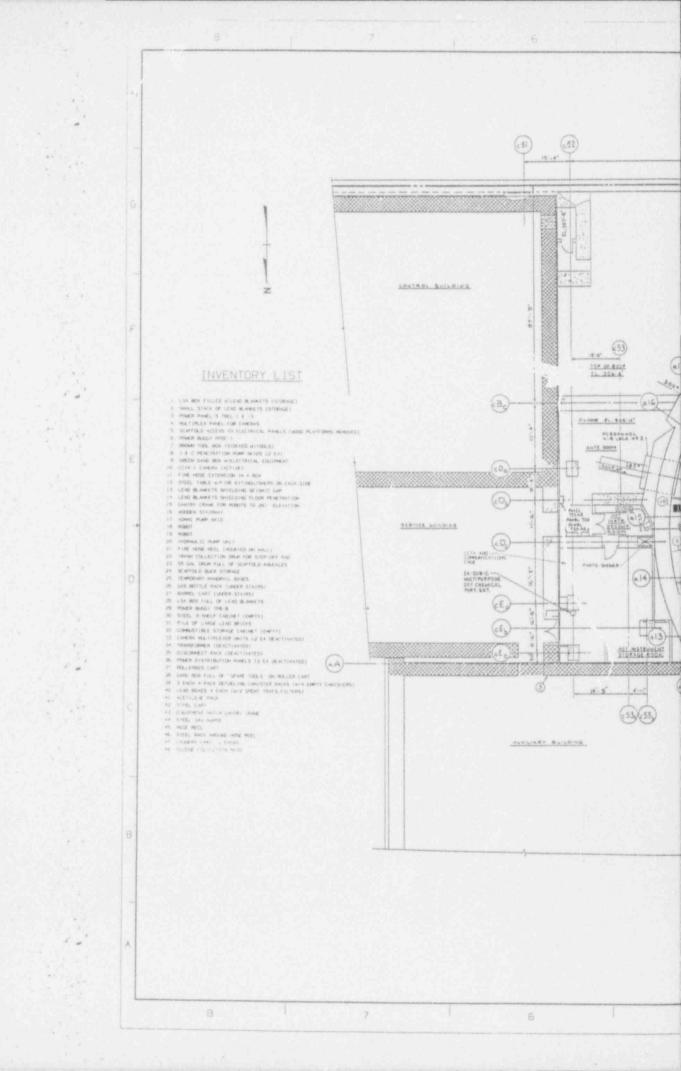
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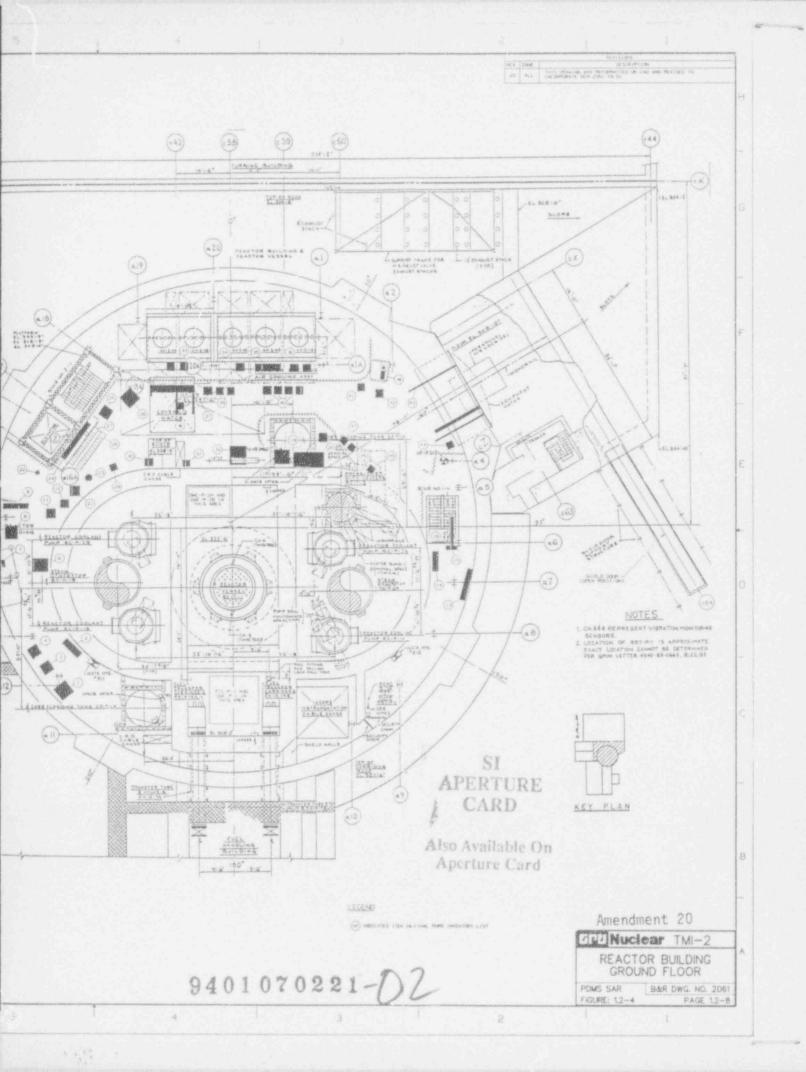
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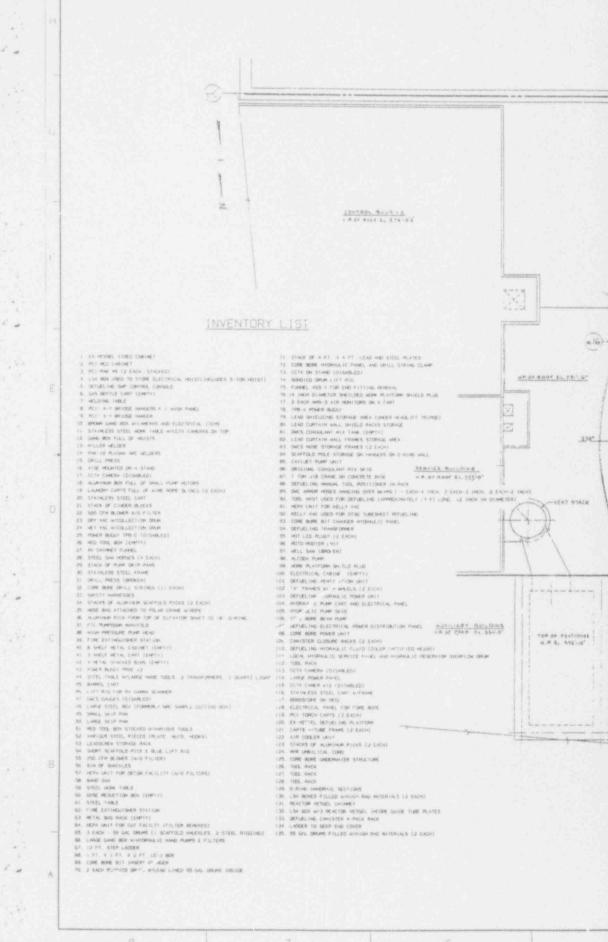
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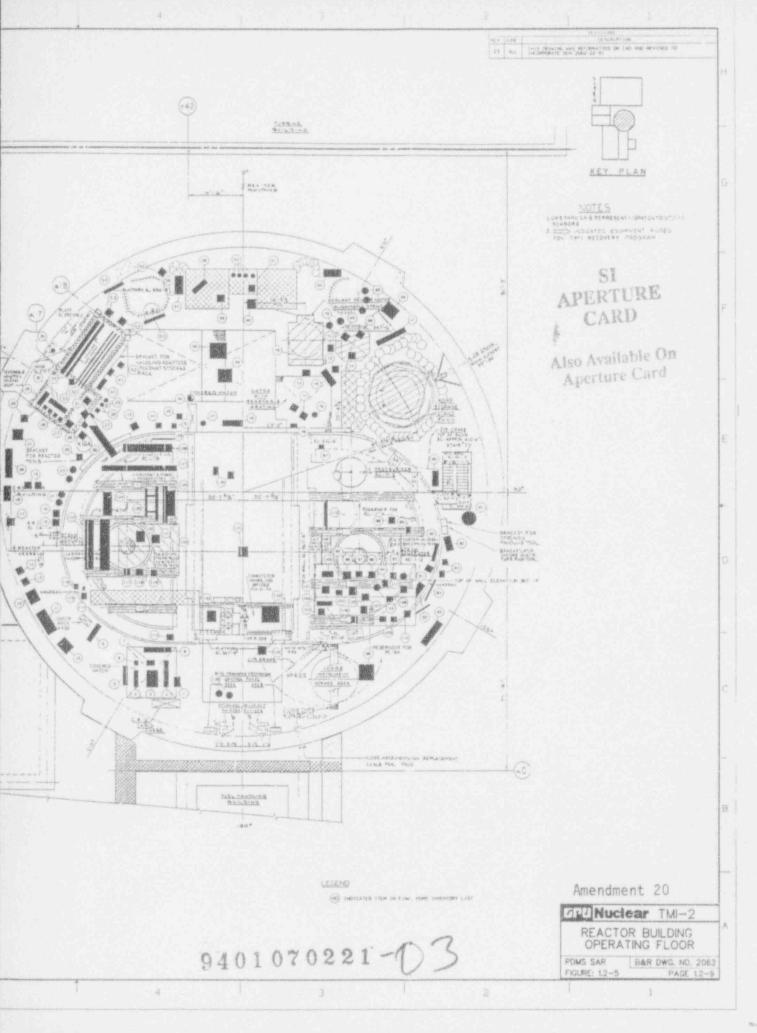




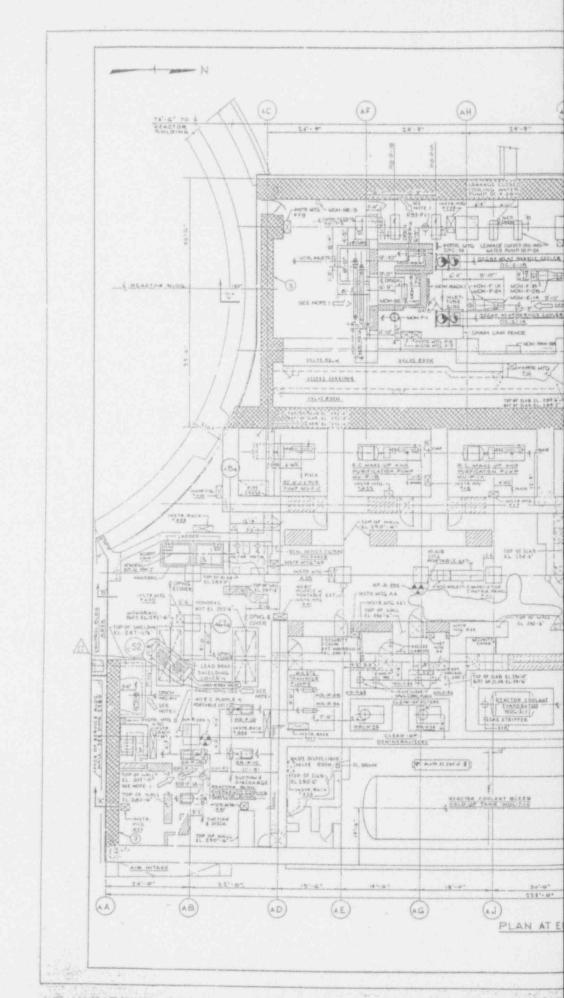




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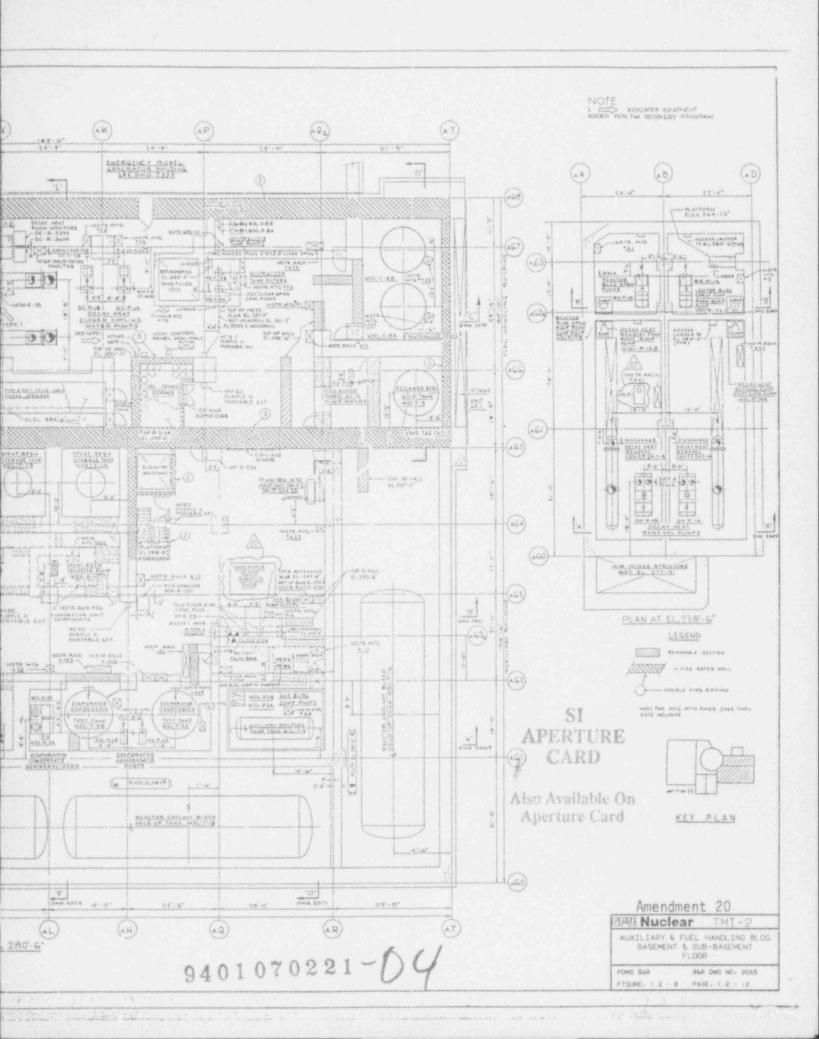
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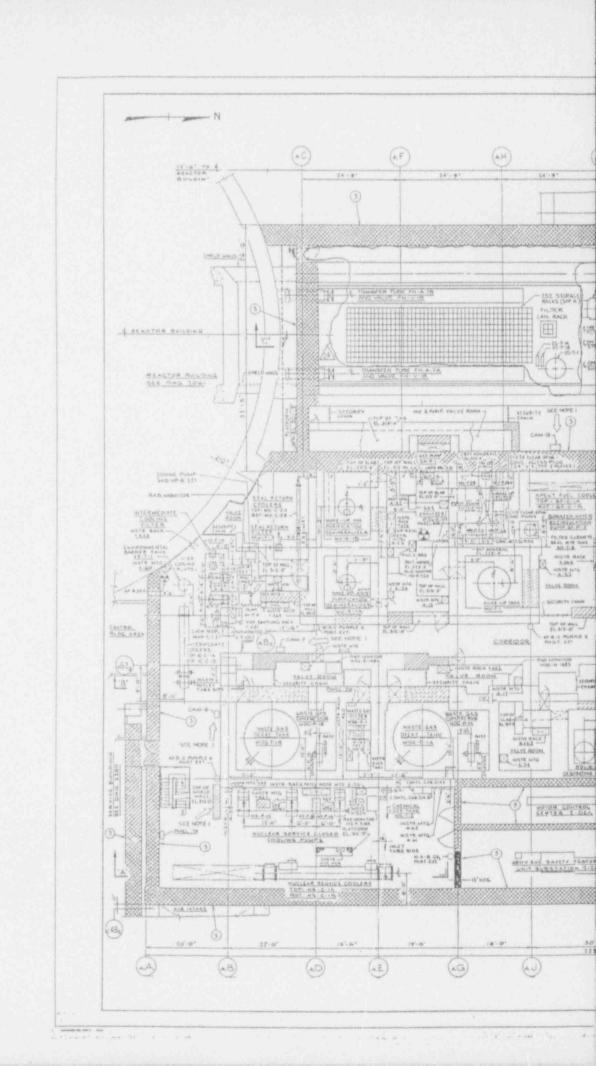


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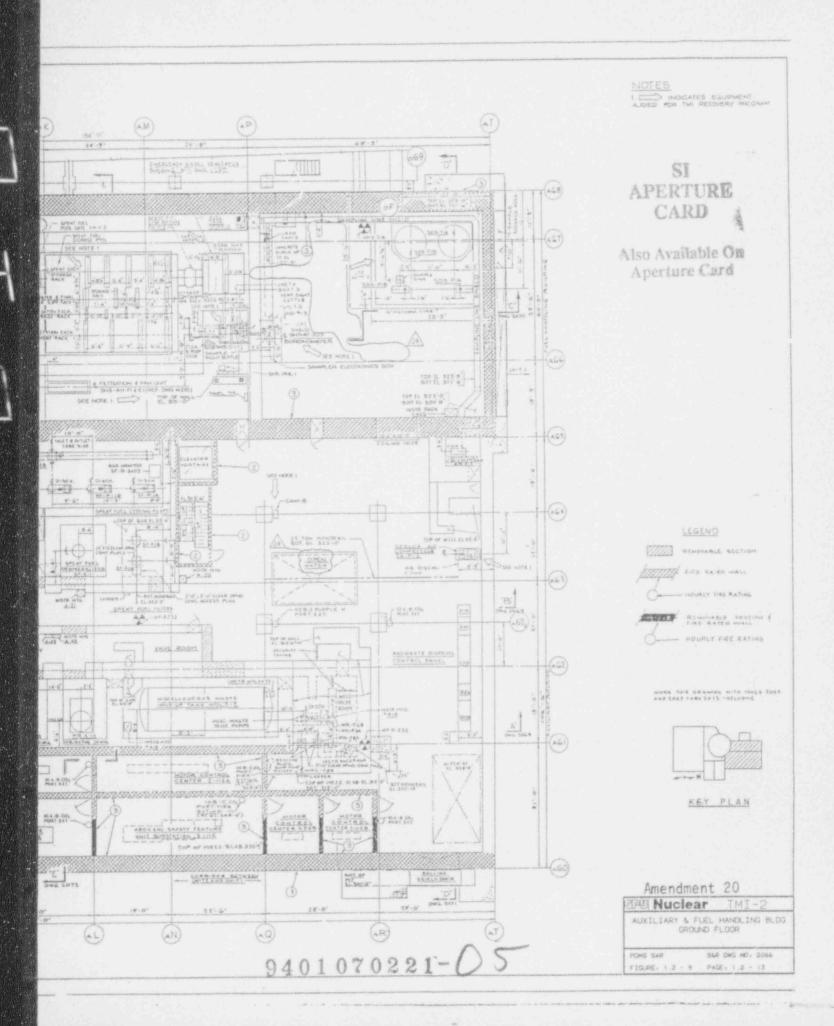
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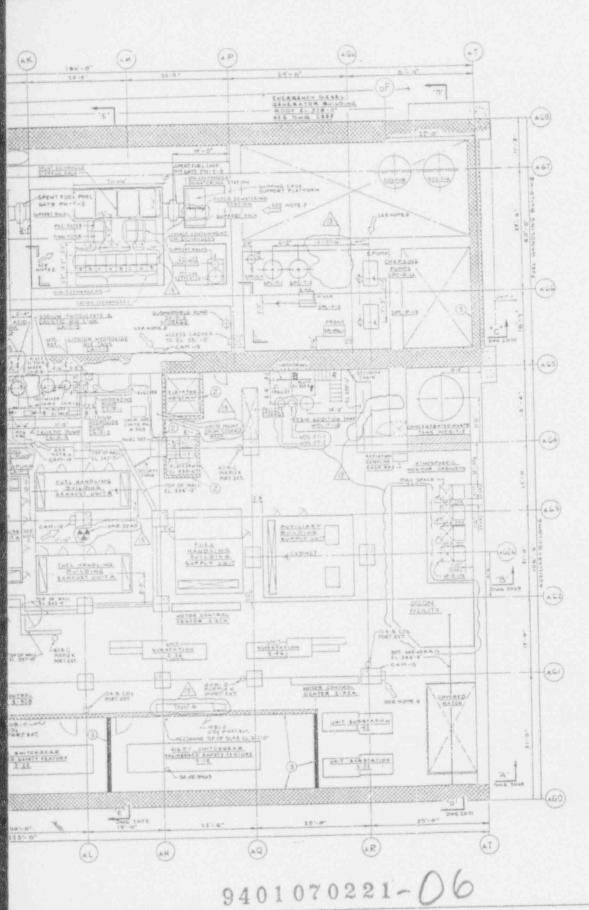




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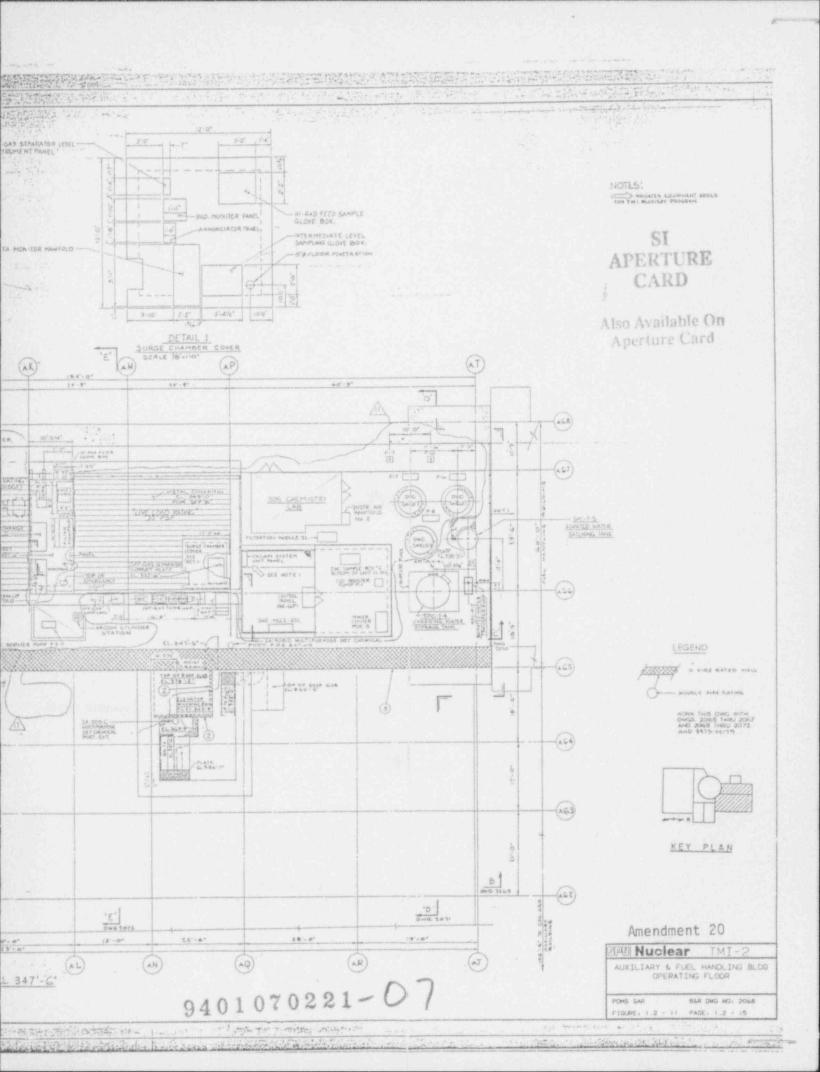
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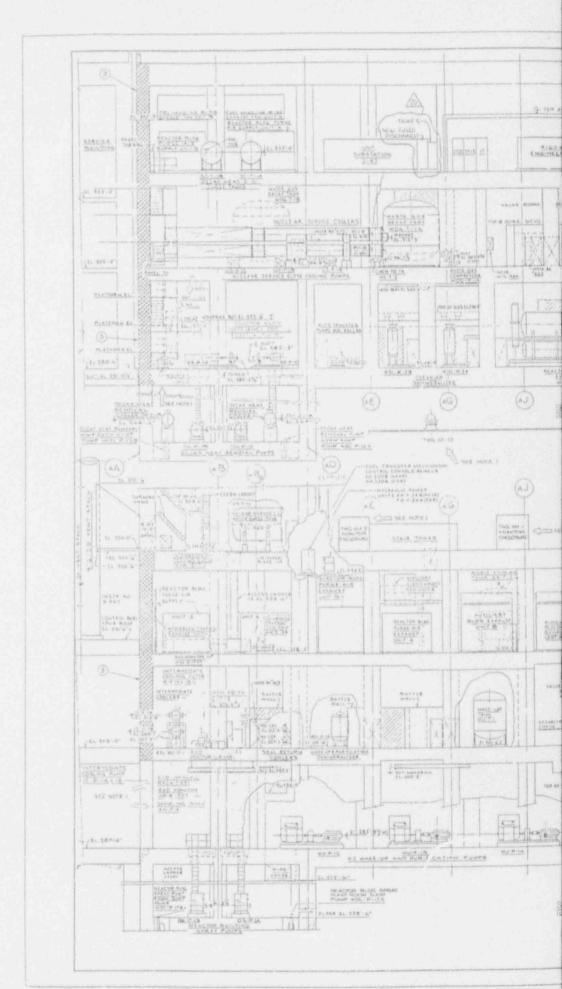
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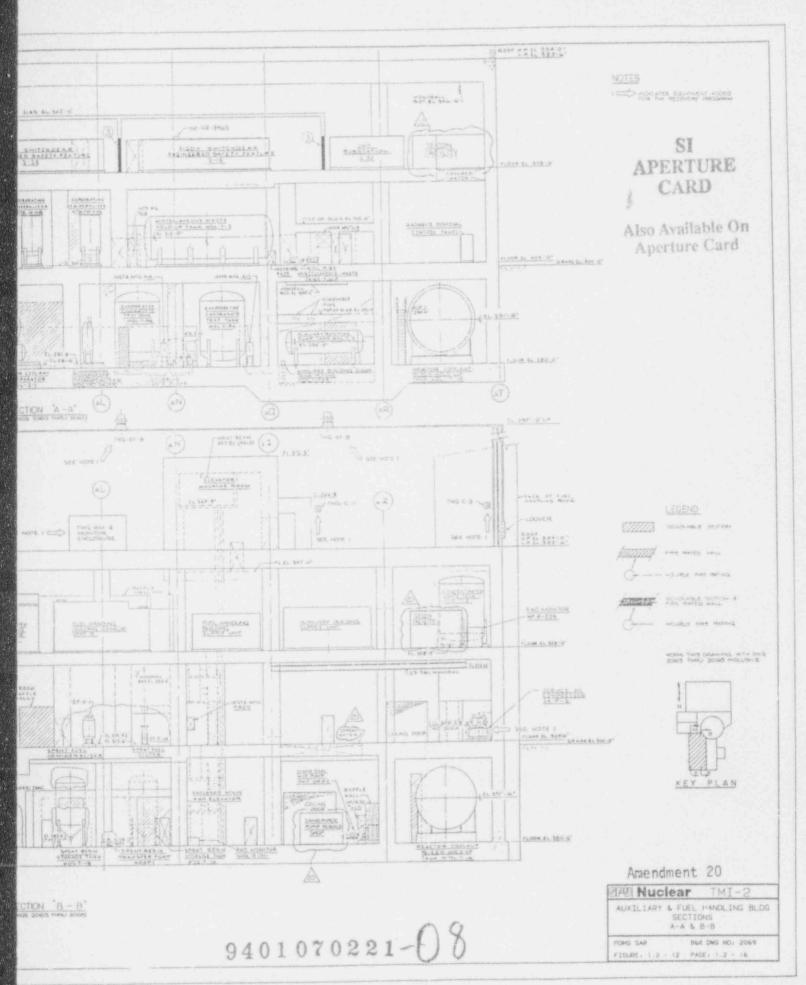
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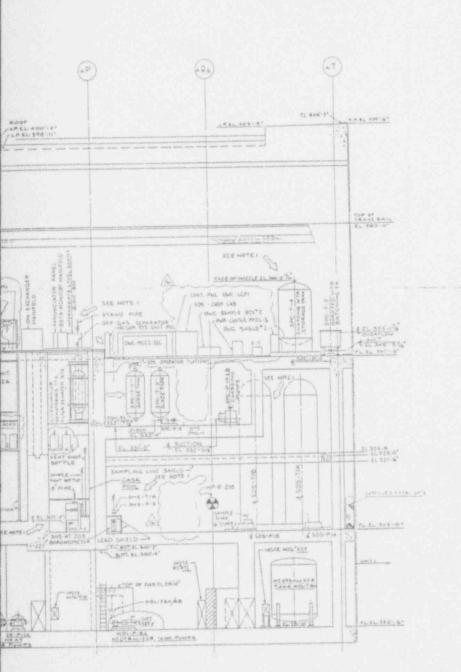
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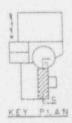
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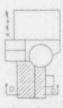


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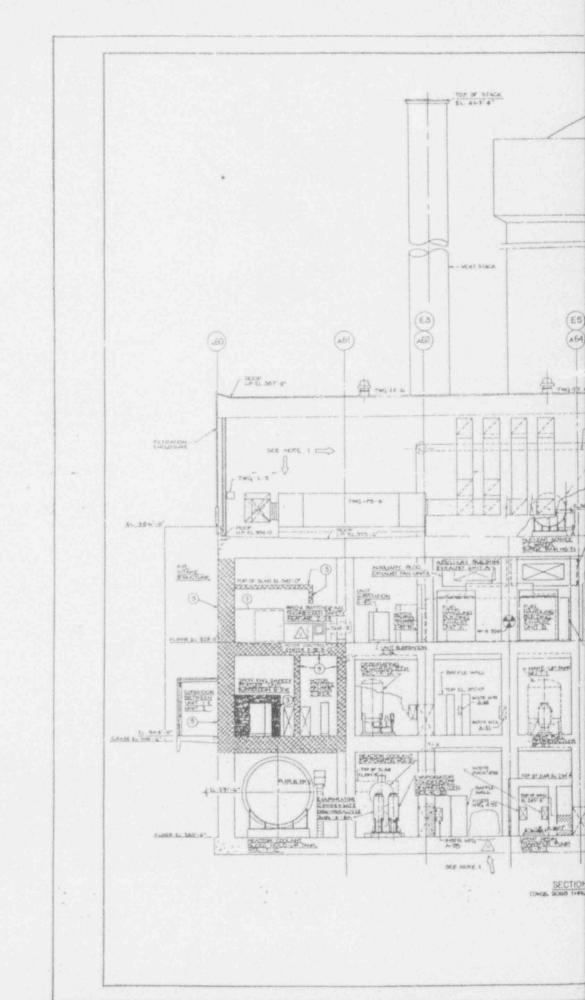
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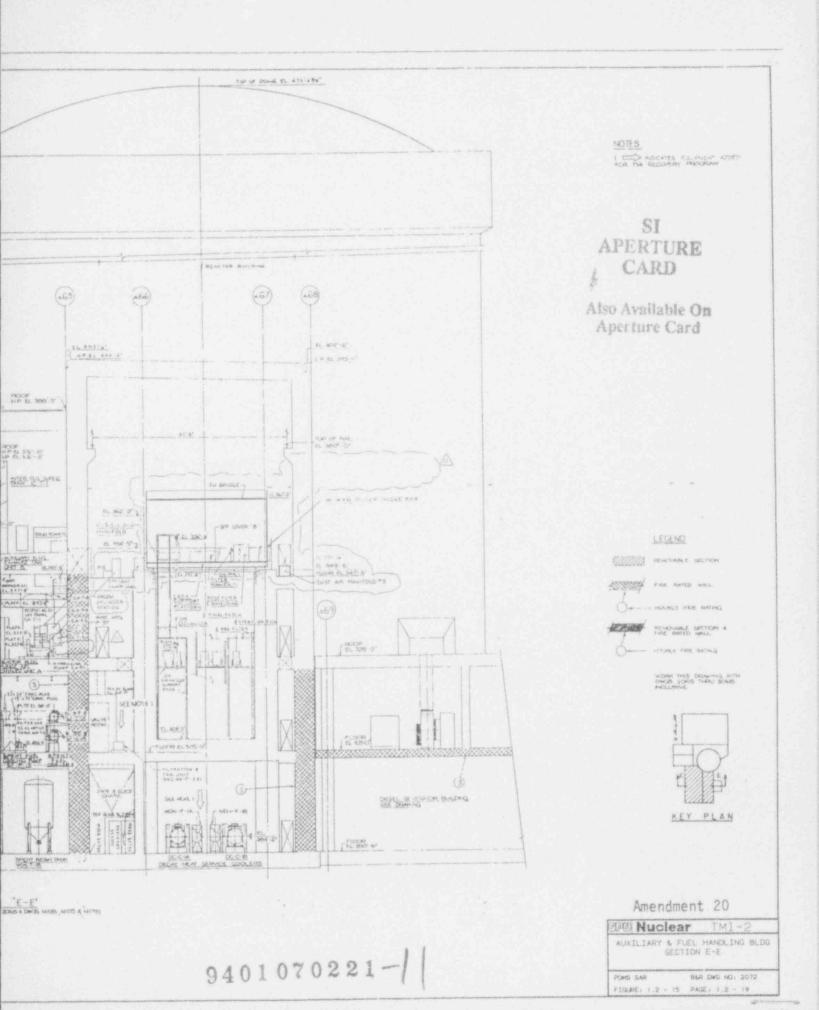
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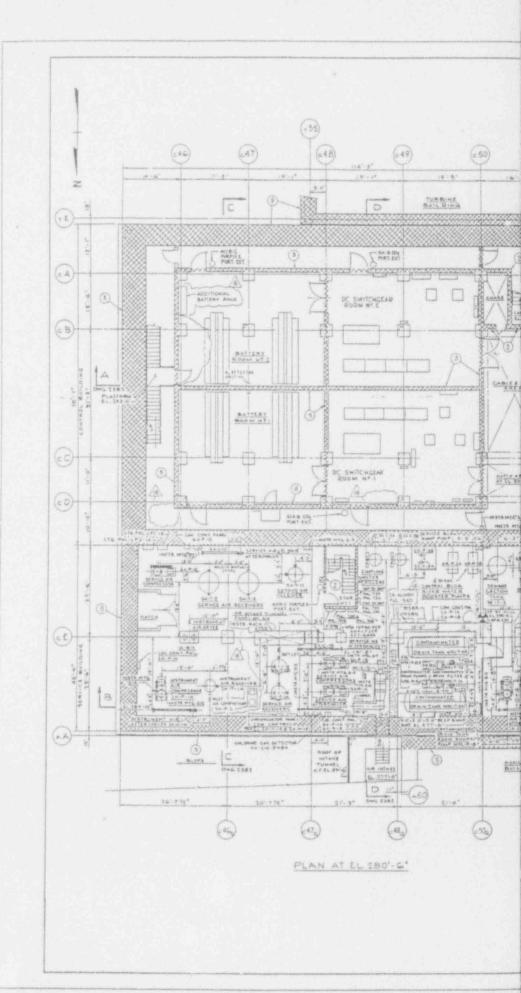
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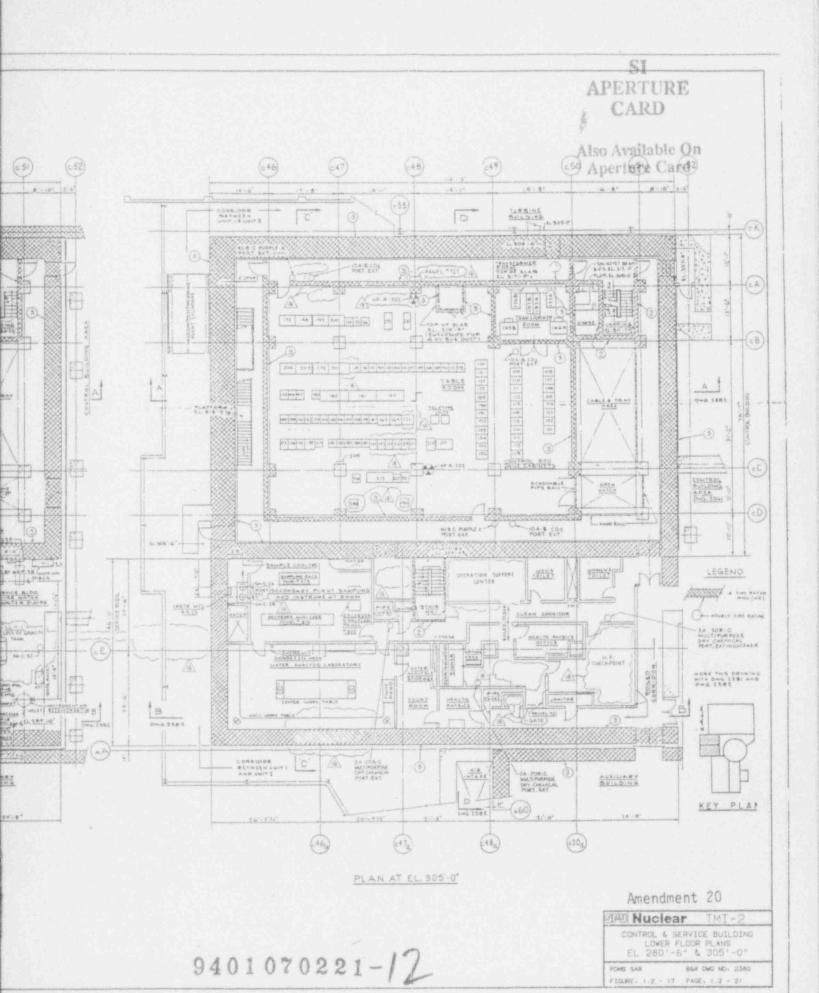
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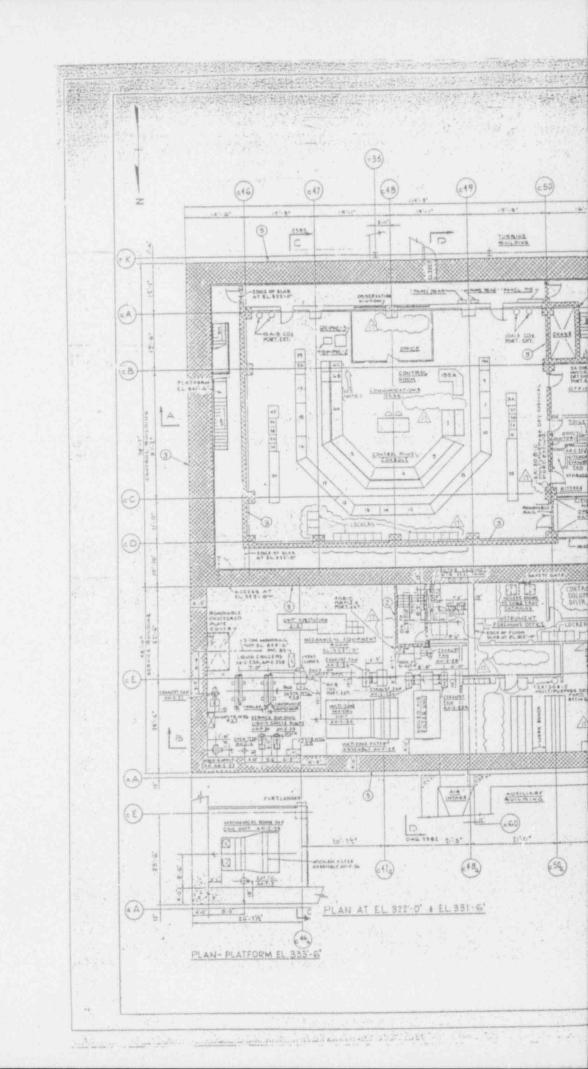
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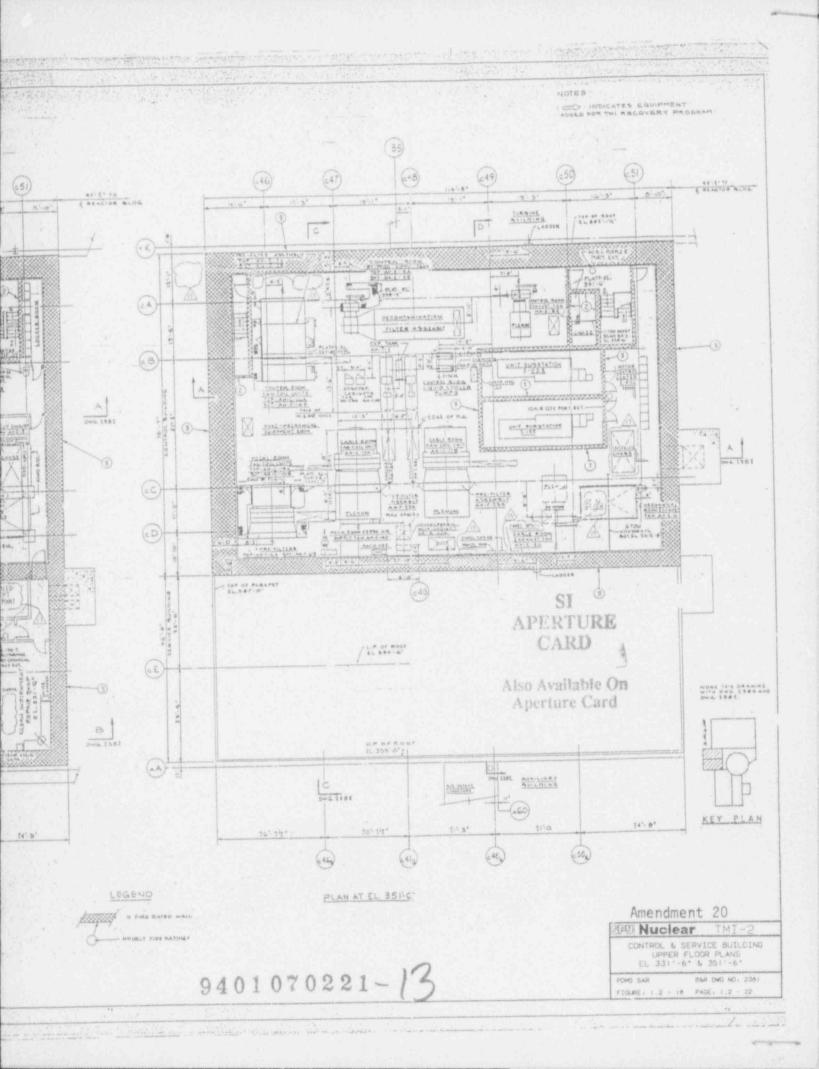


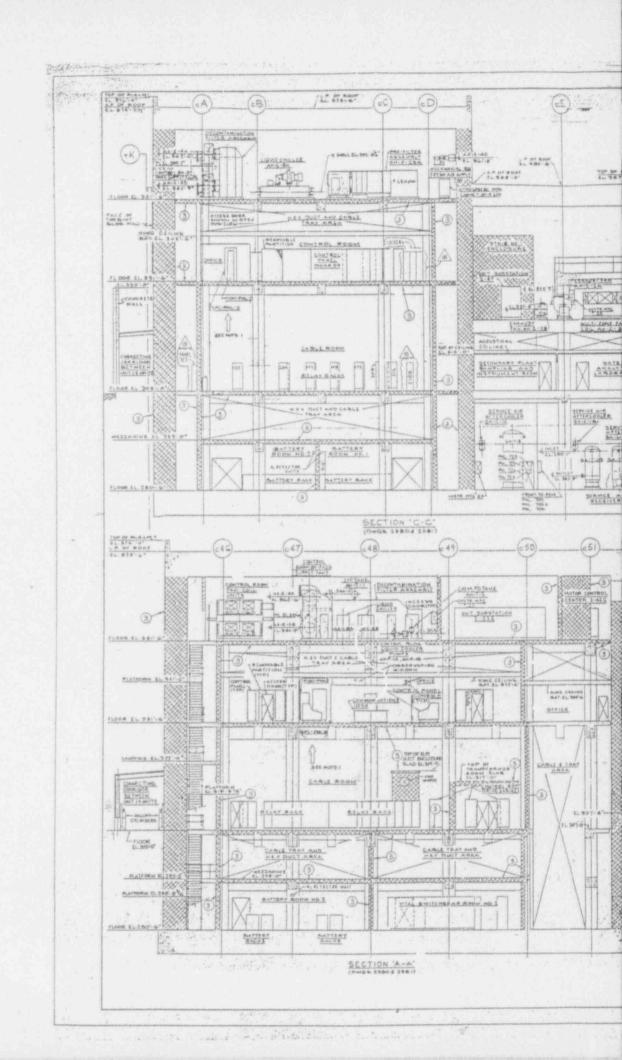


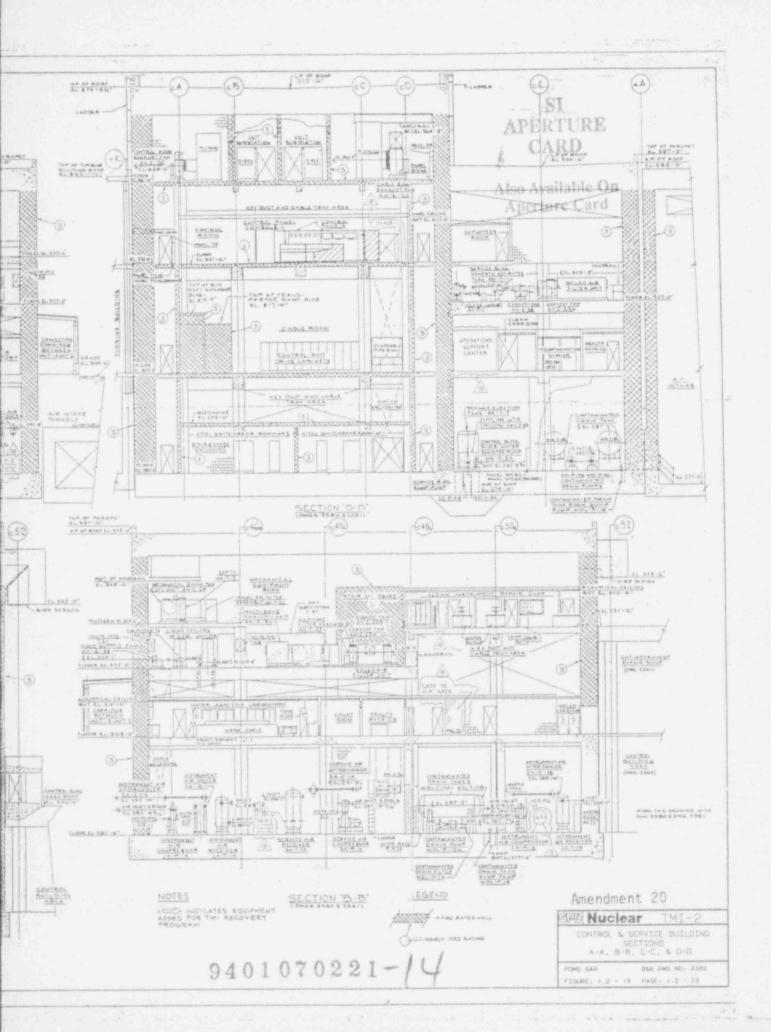




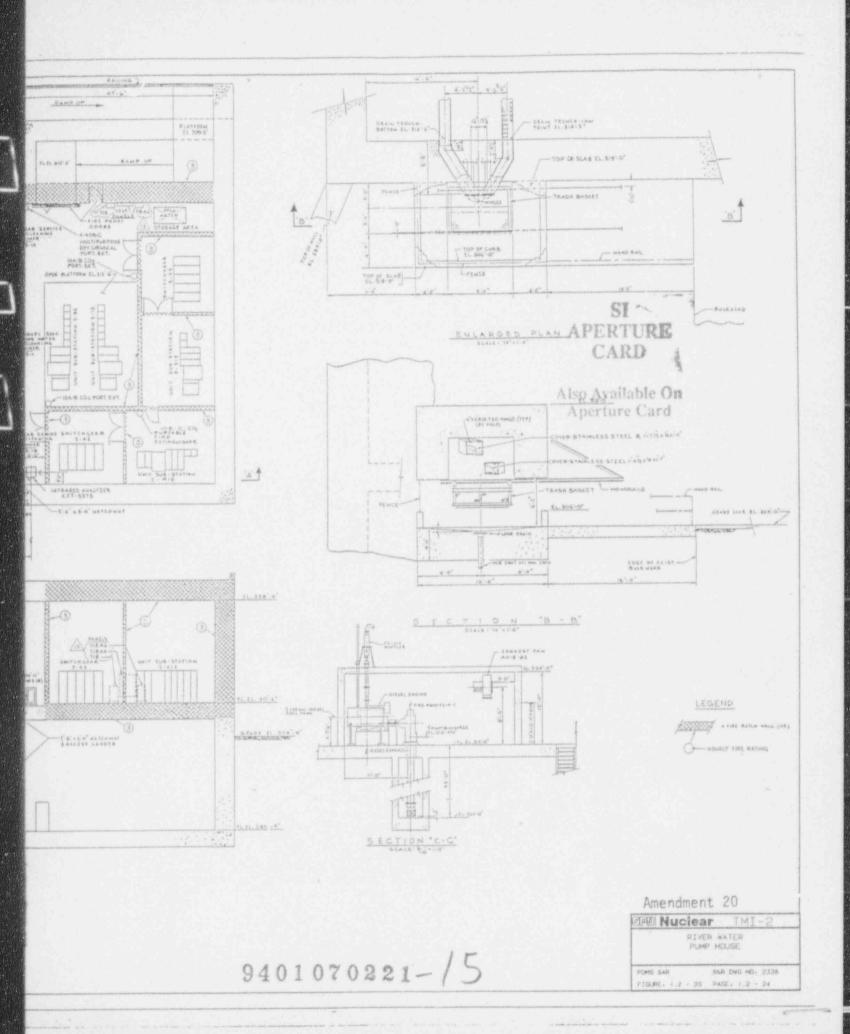


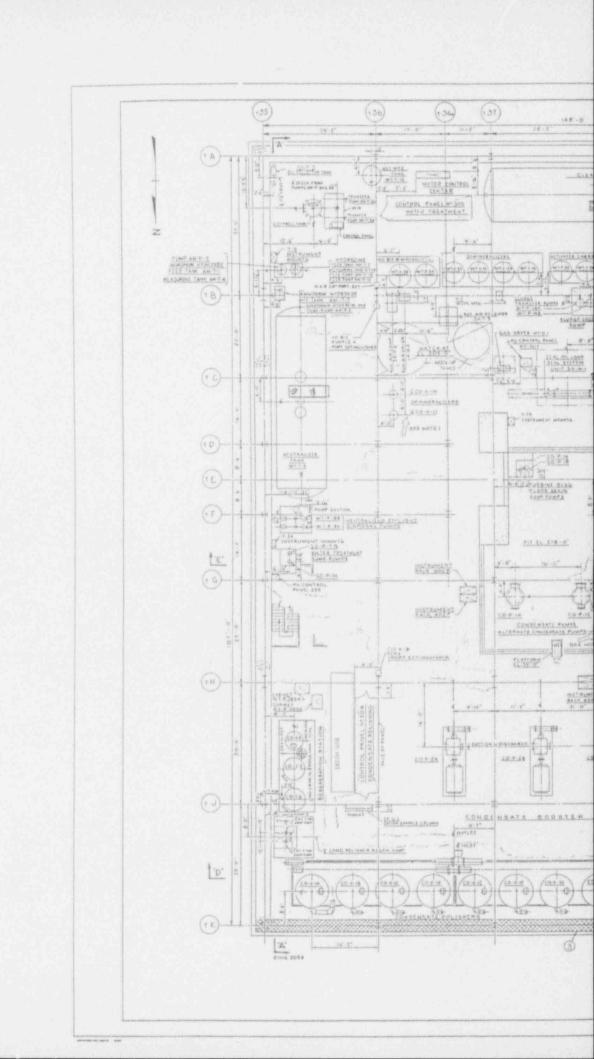


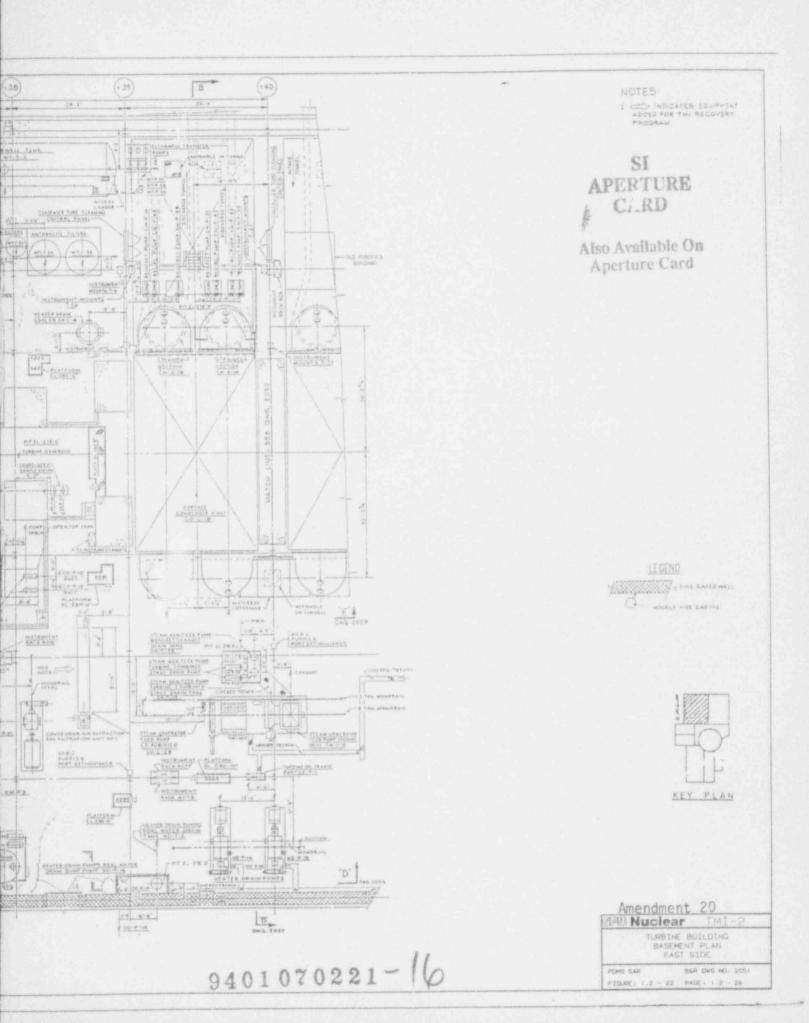




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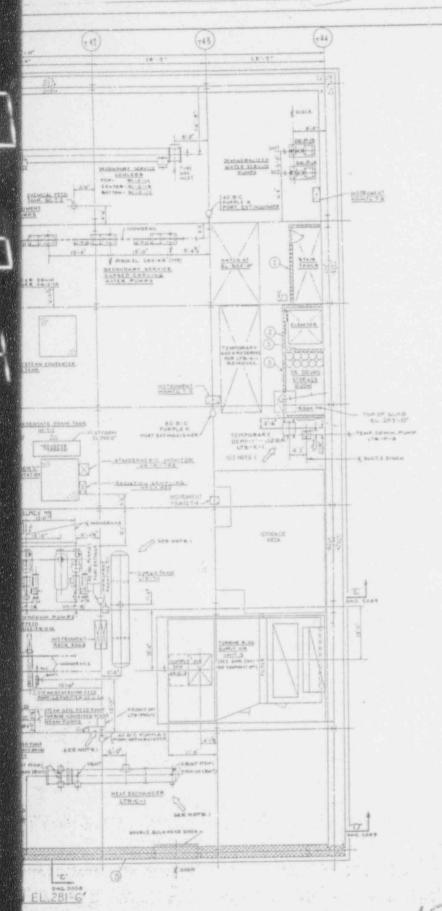






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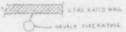


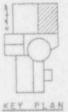


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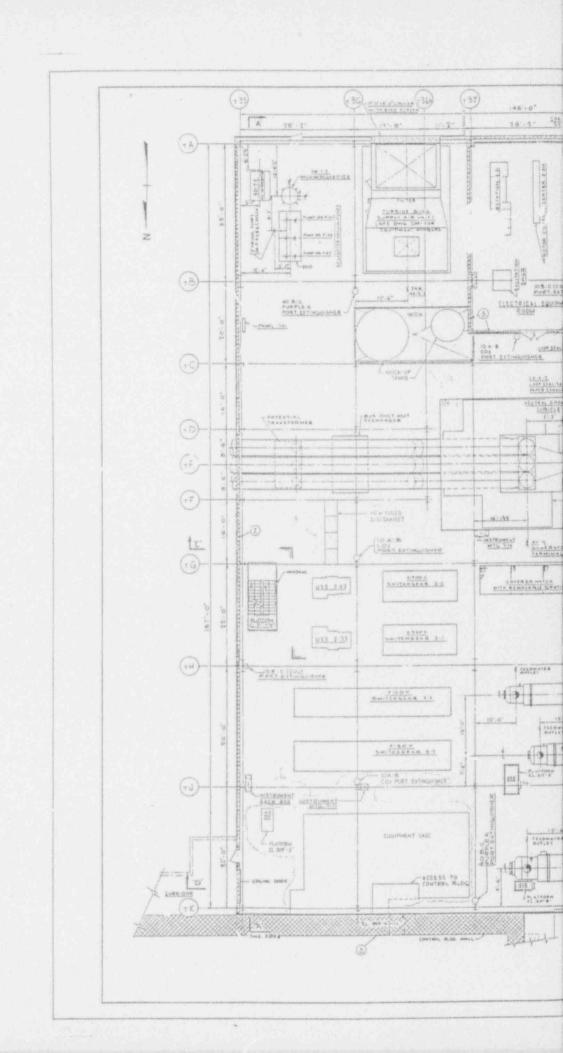
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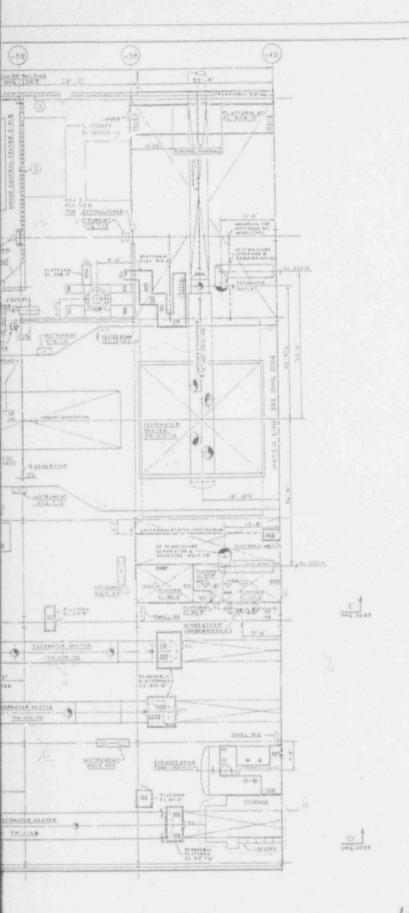
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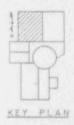


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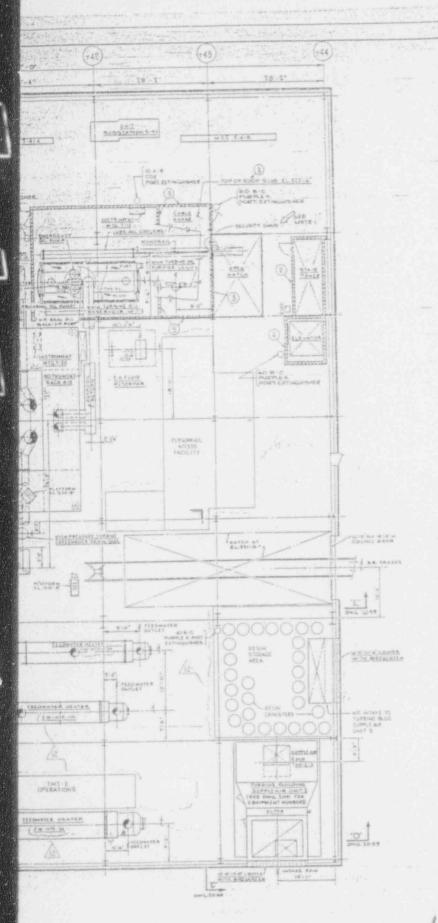
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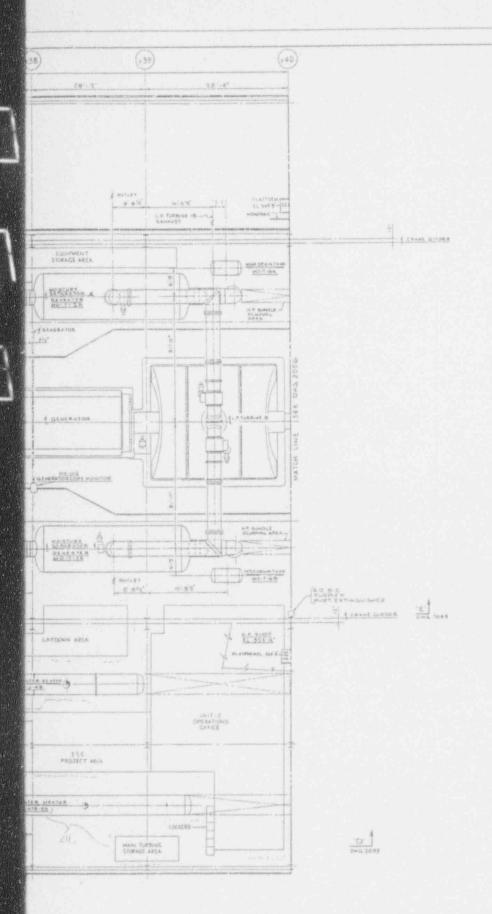
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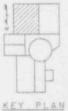


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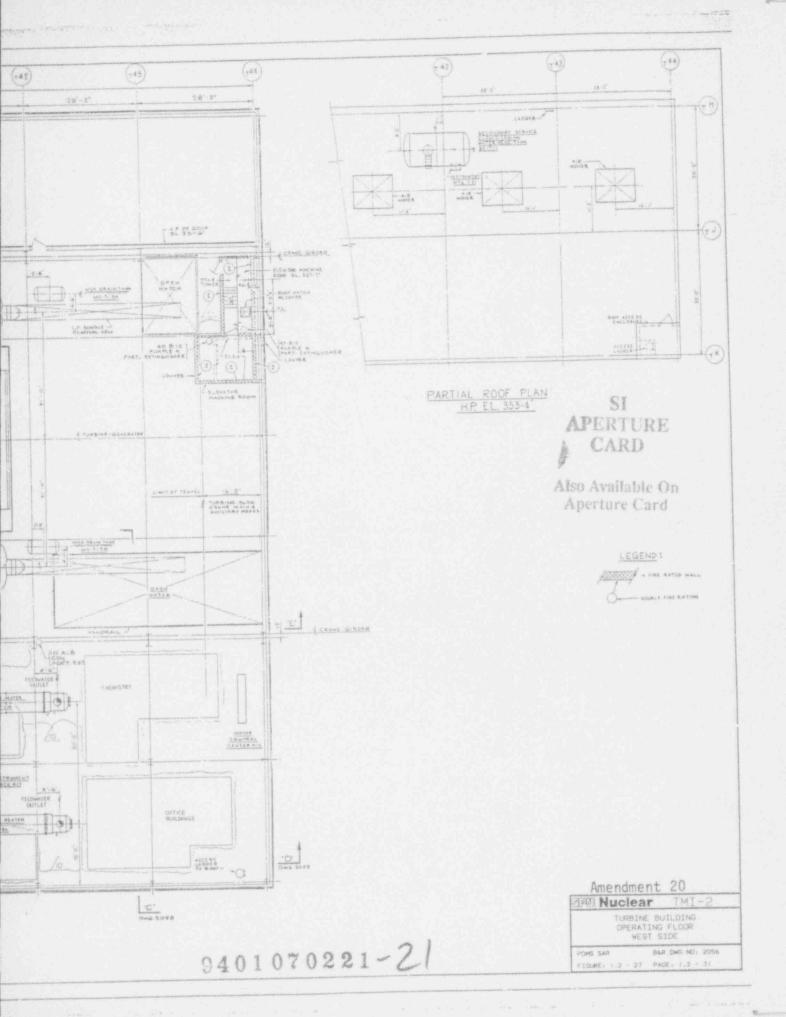
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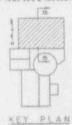
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LEGEND : SINE BATED WALL

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Amendment 20

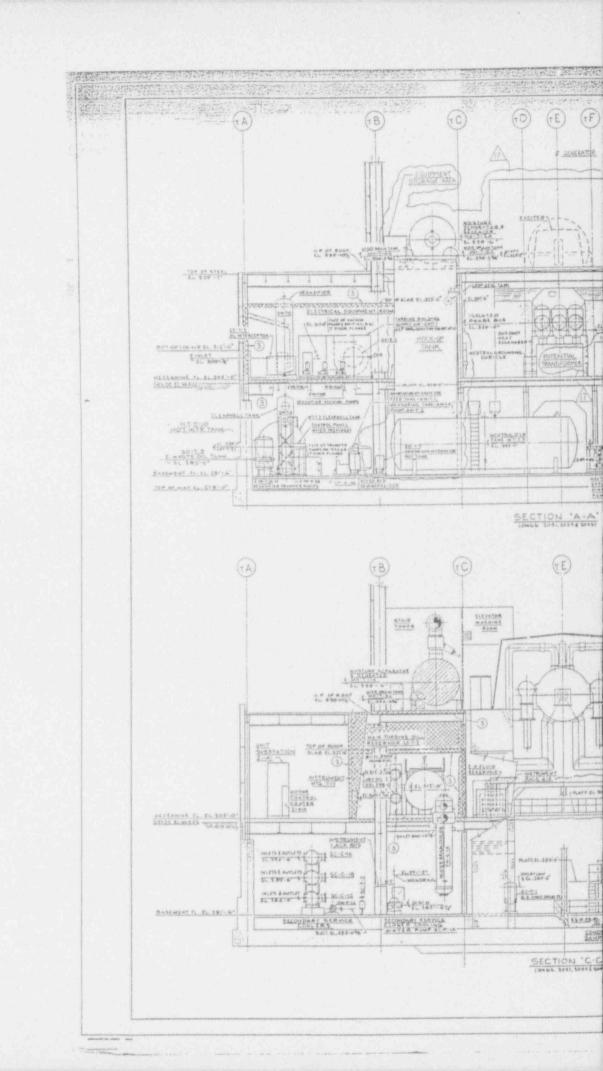
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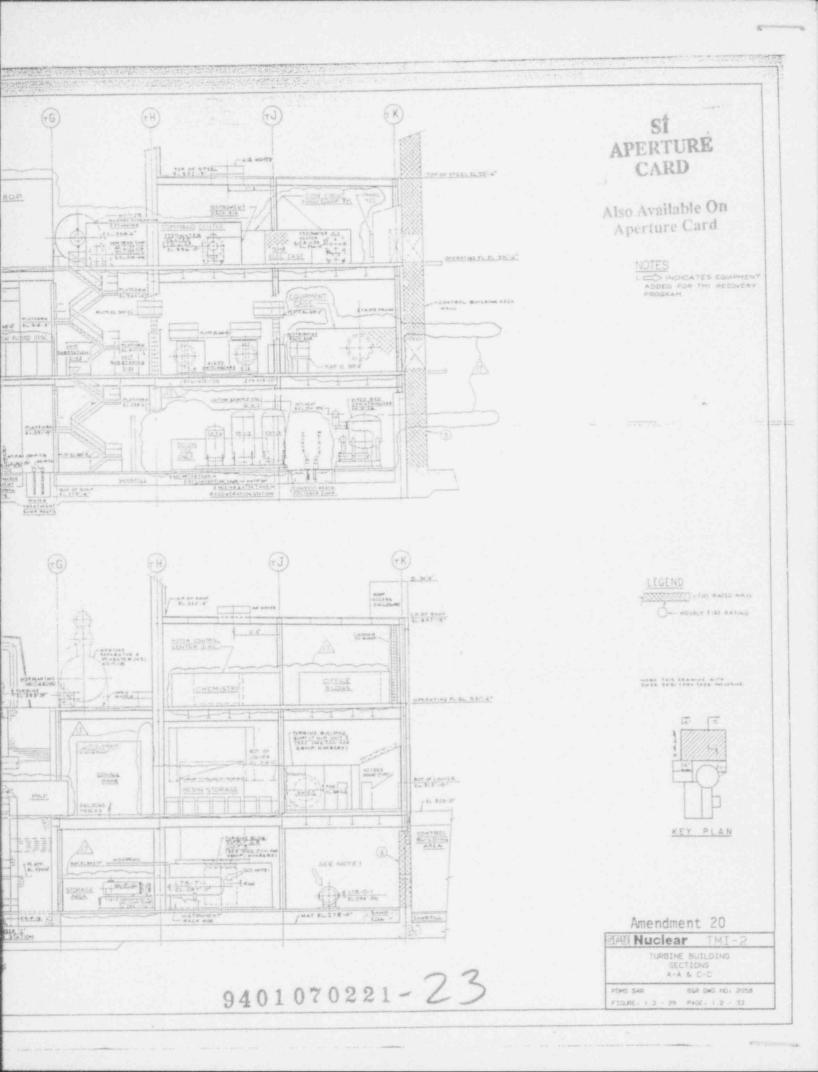
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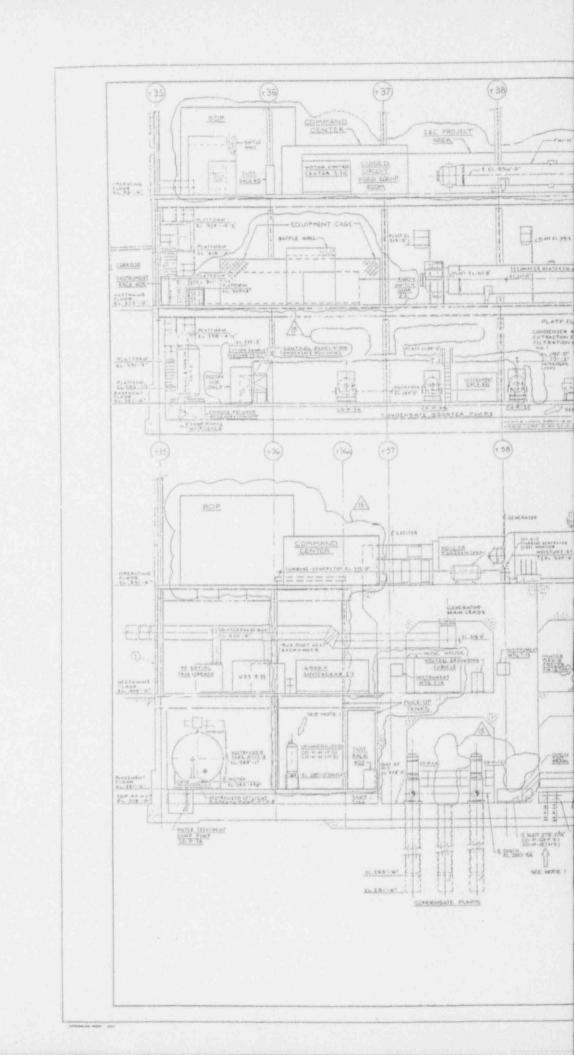
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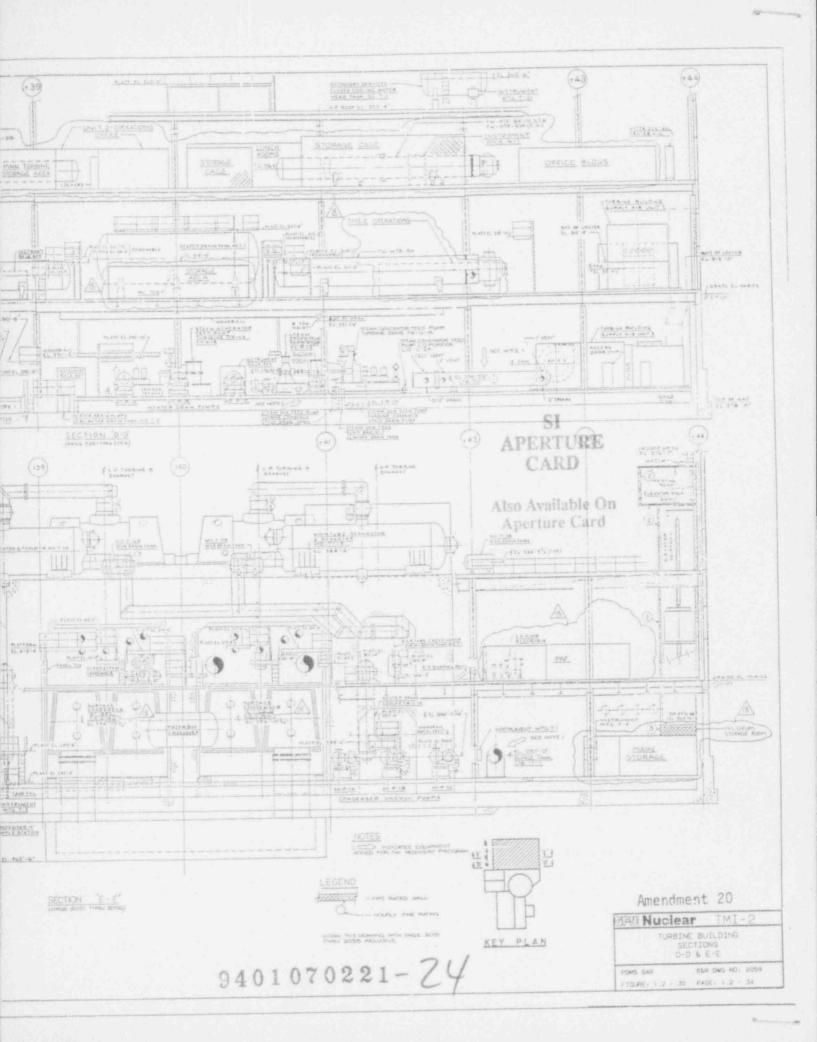
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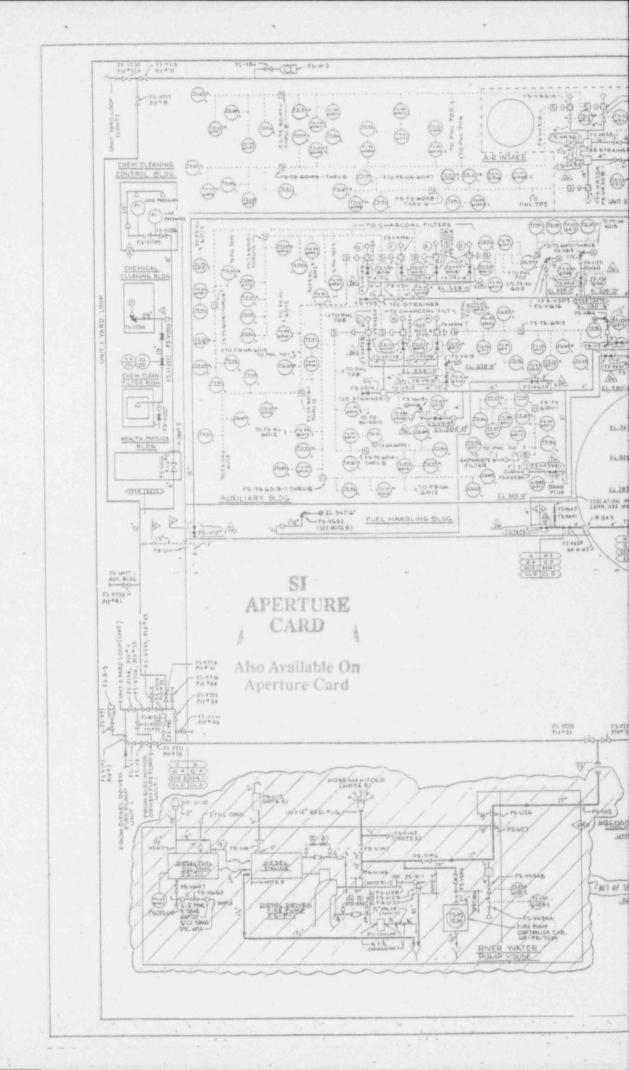
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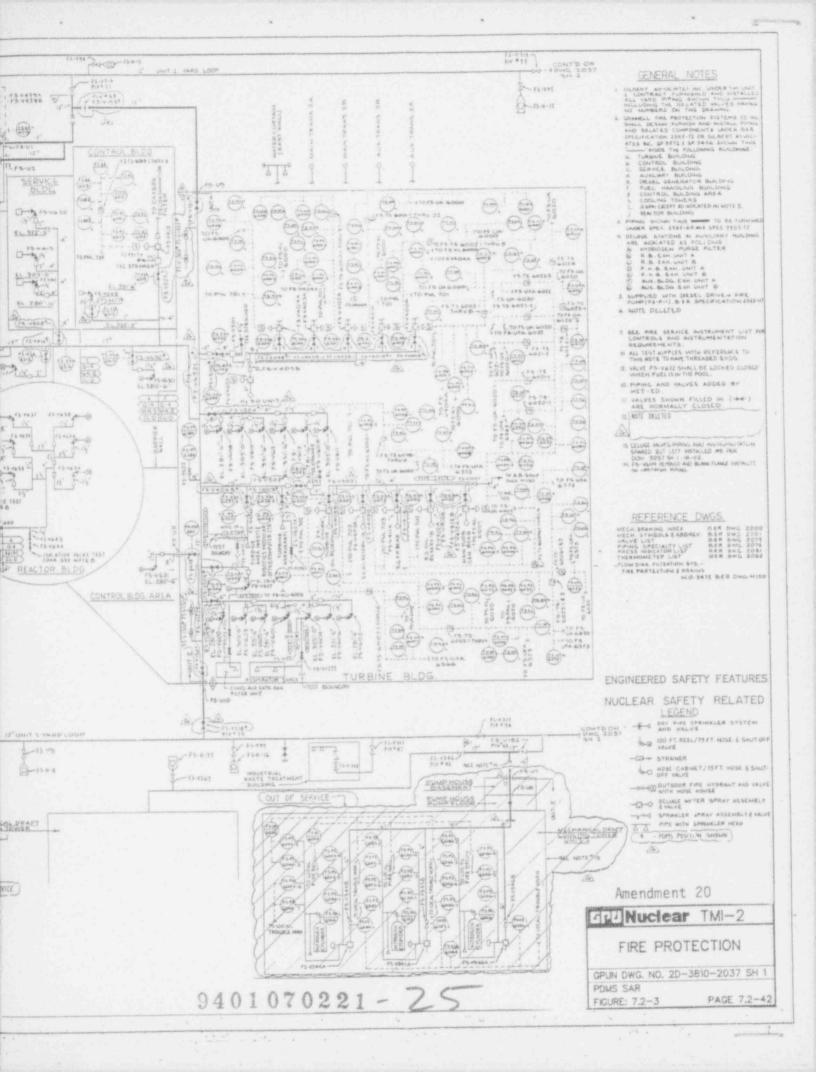


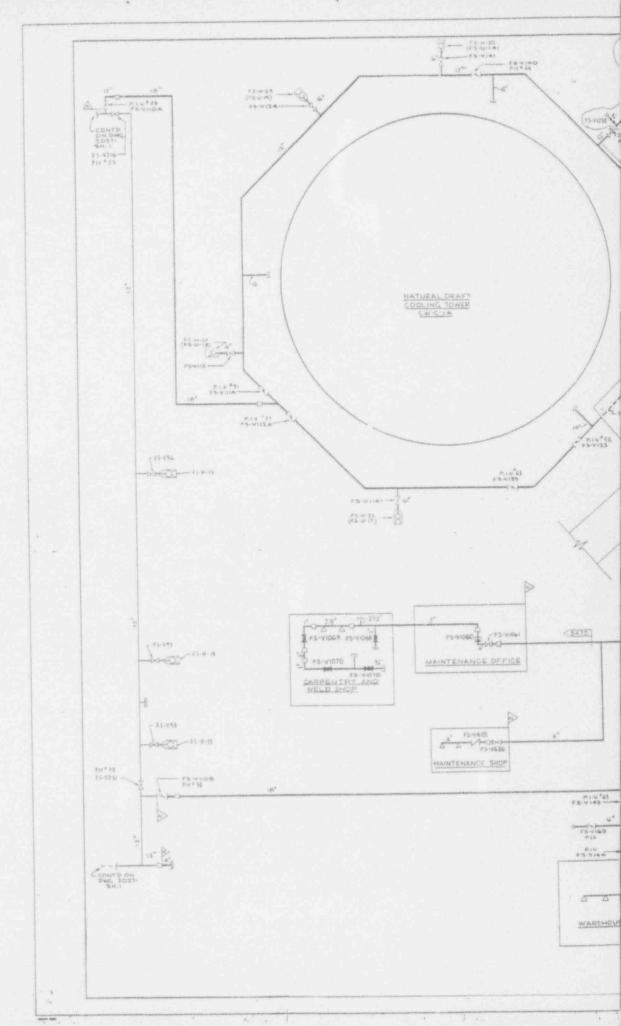


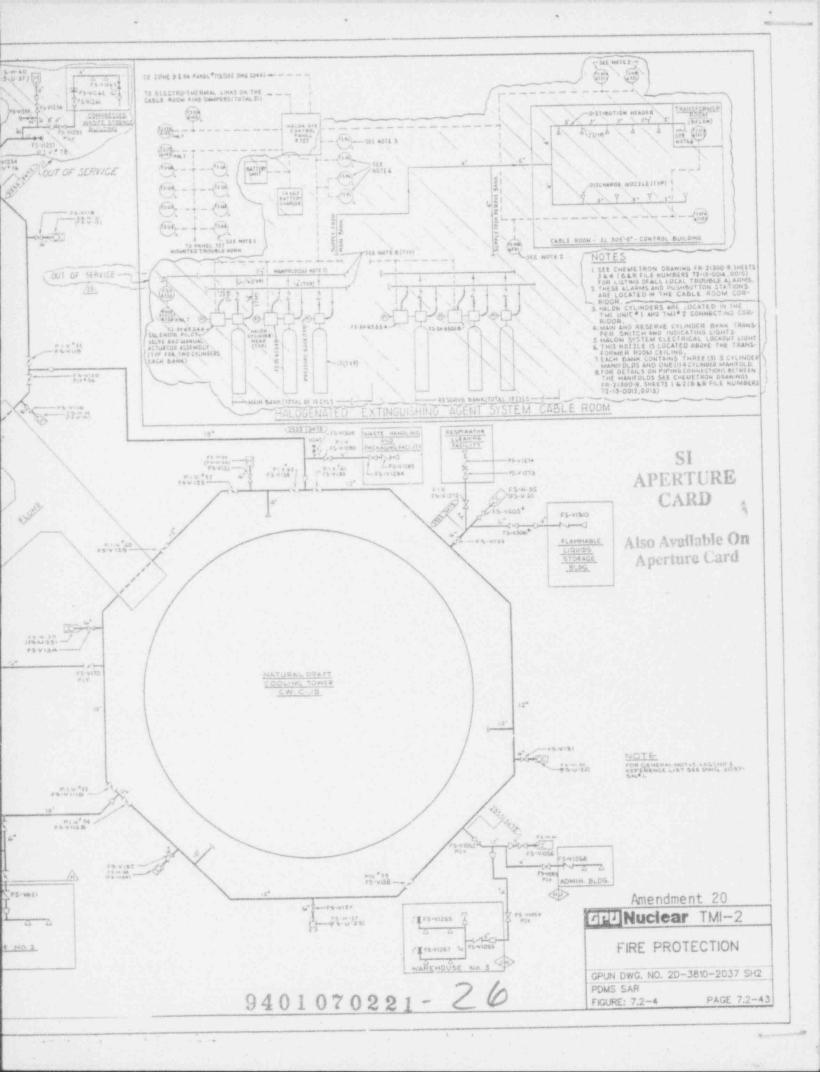


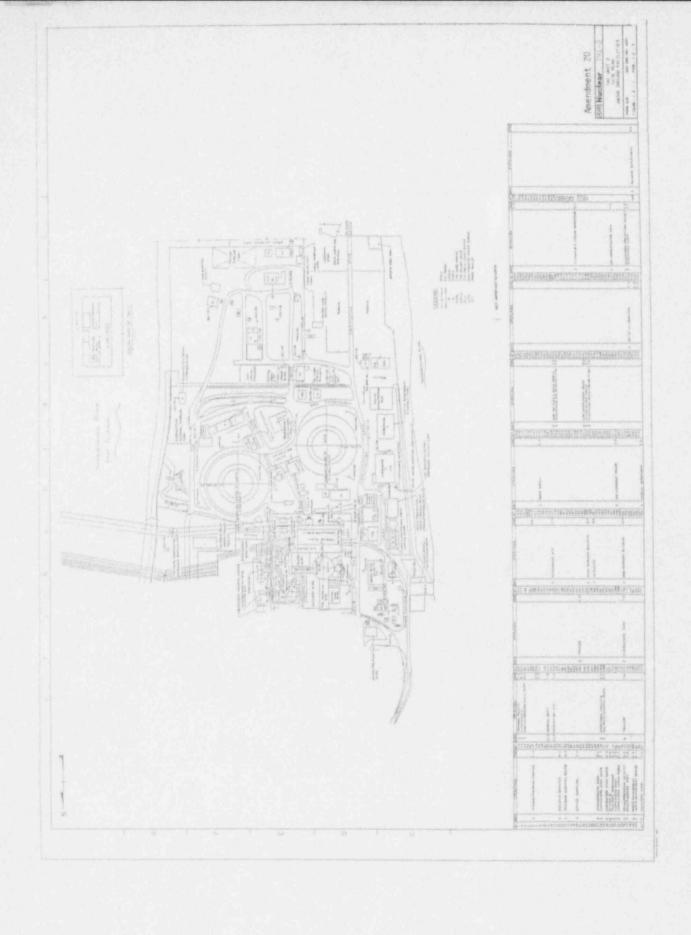


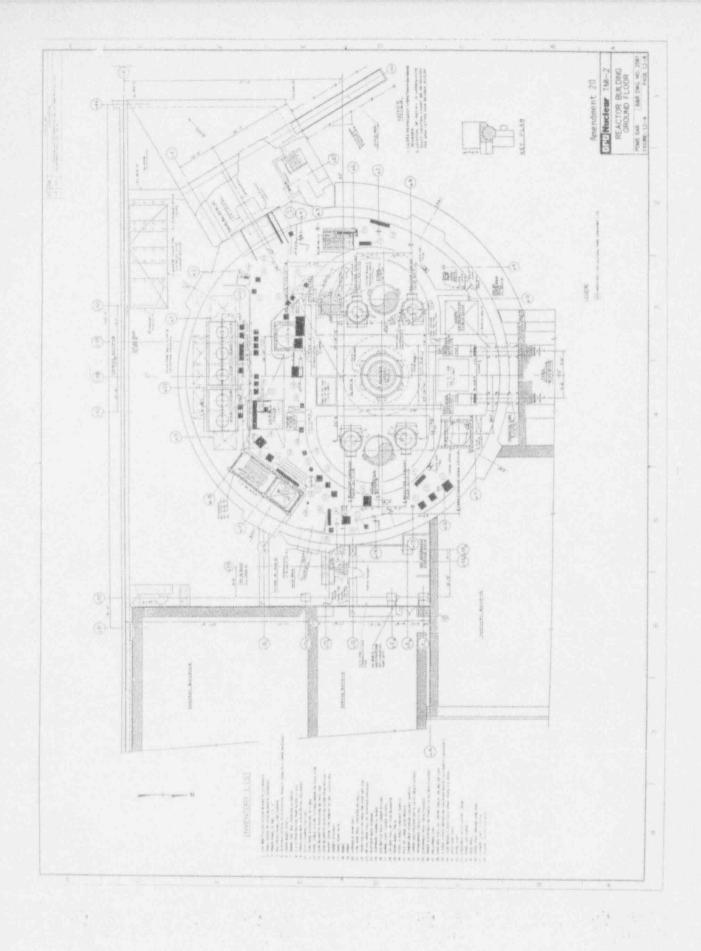


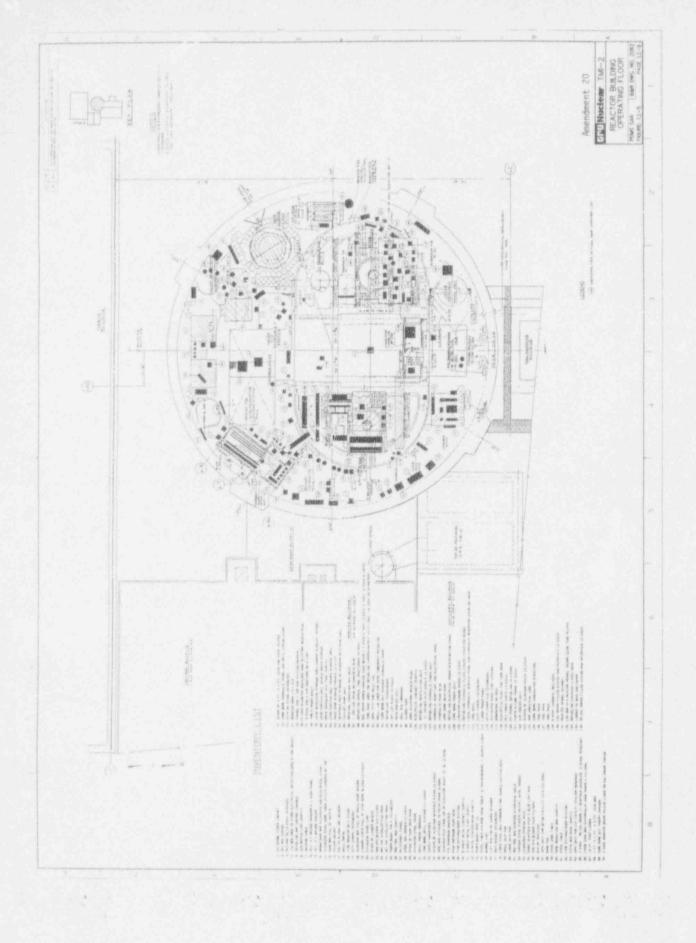


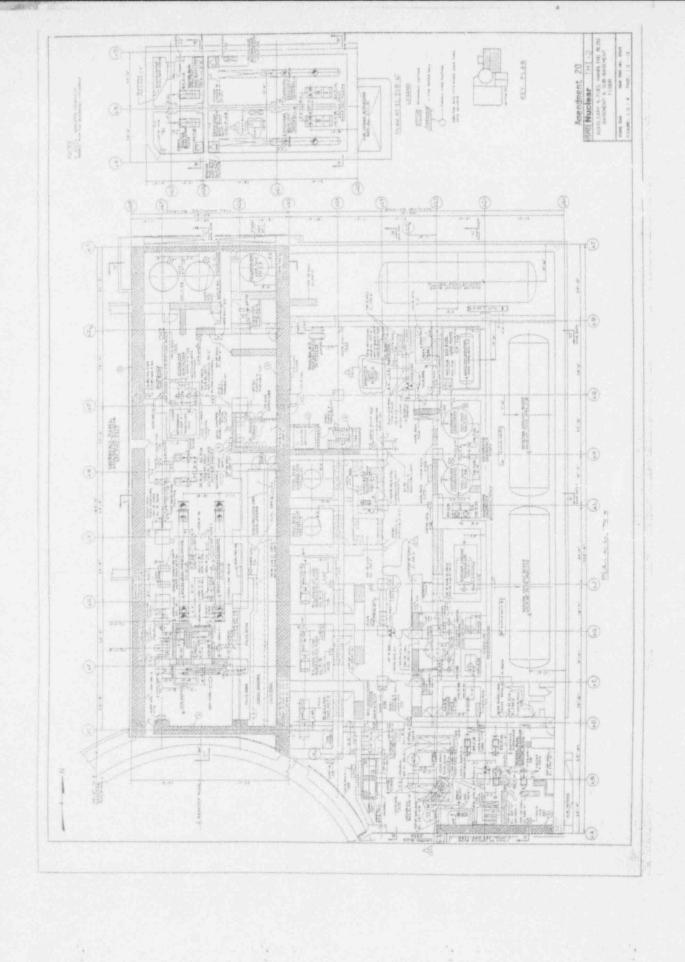


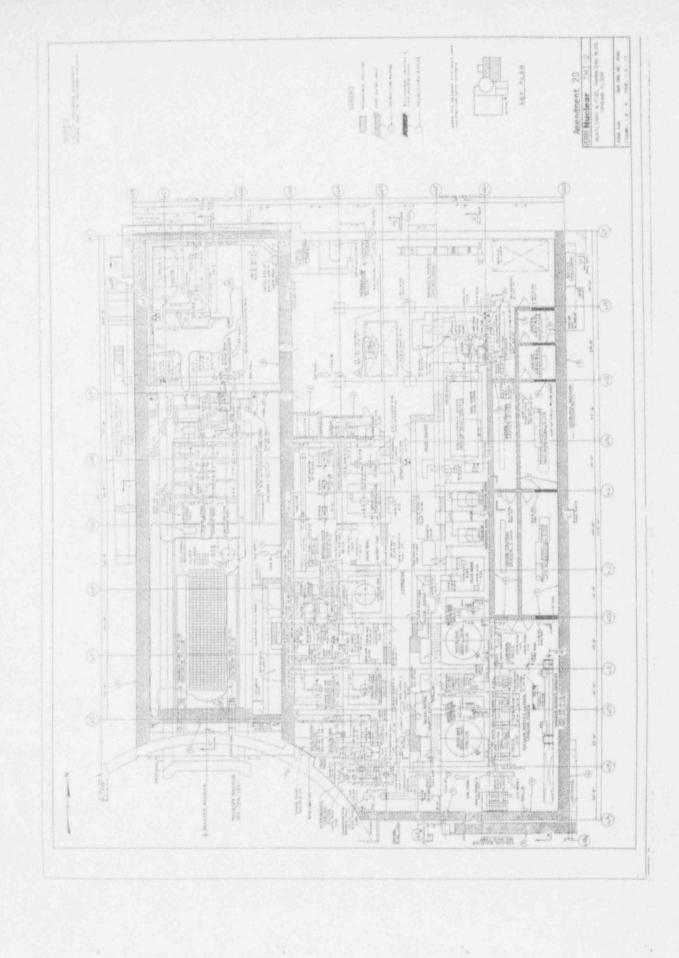


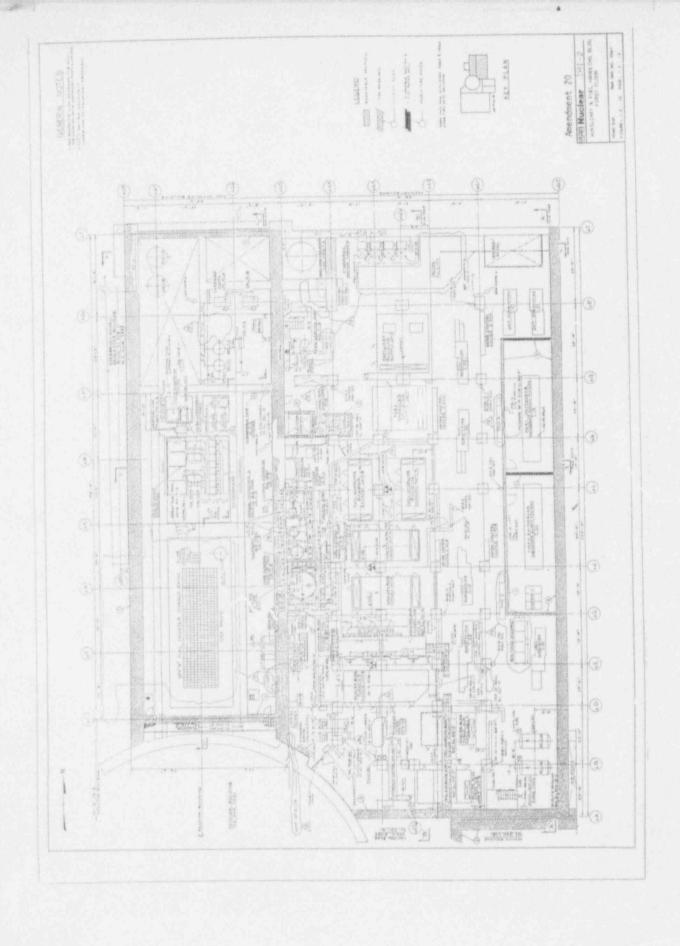


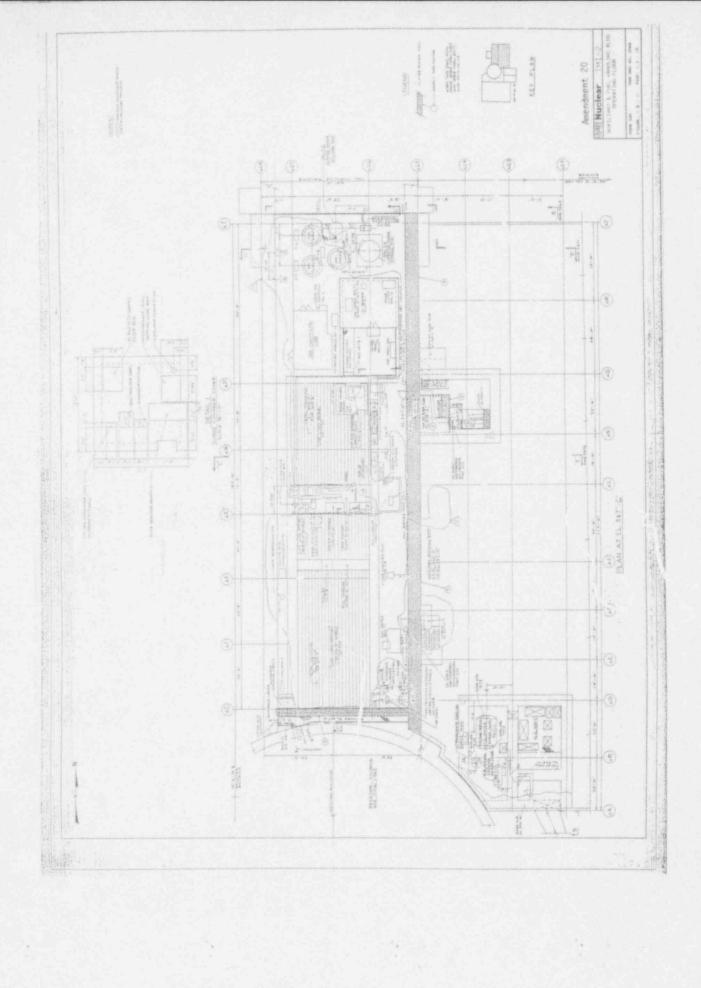


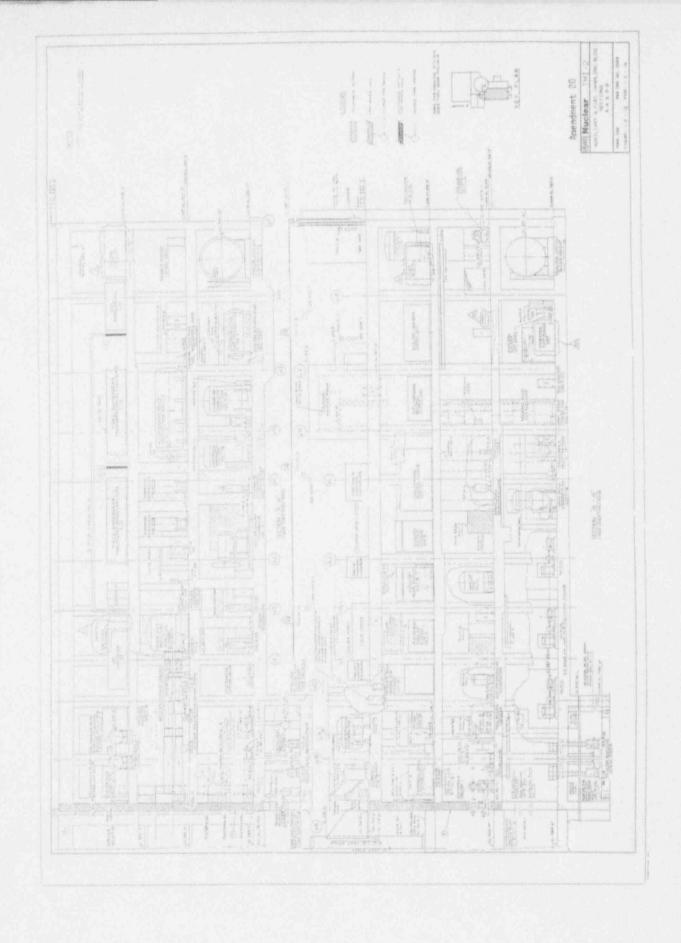


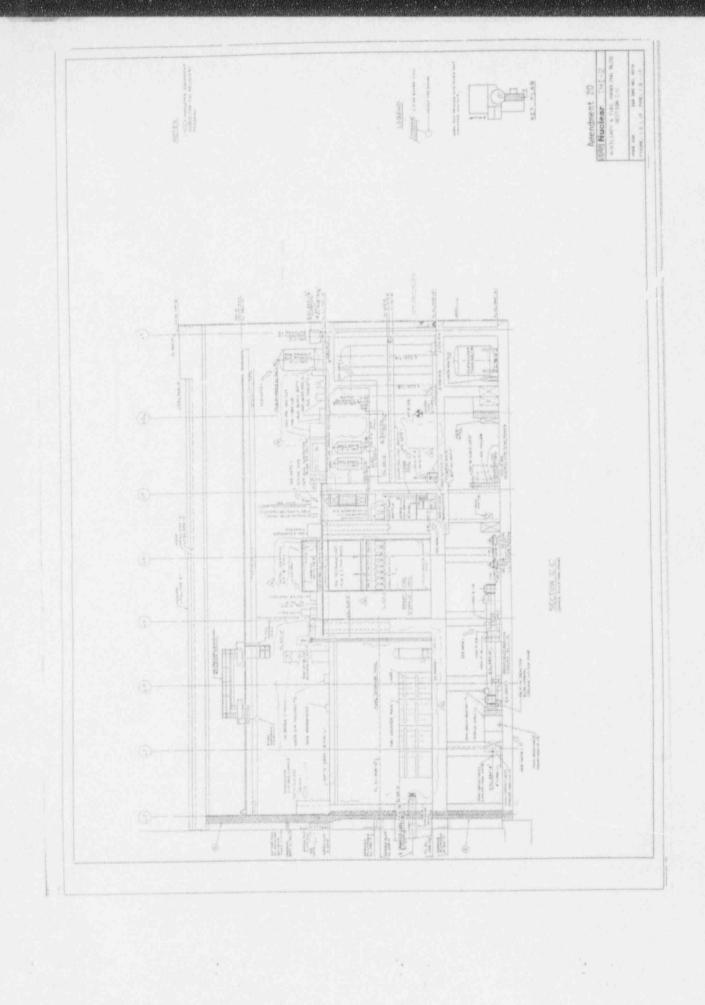


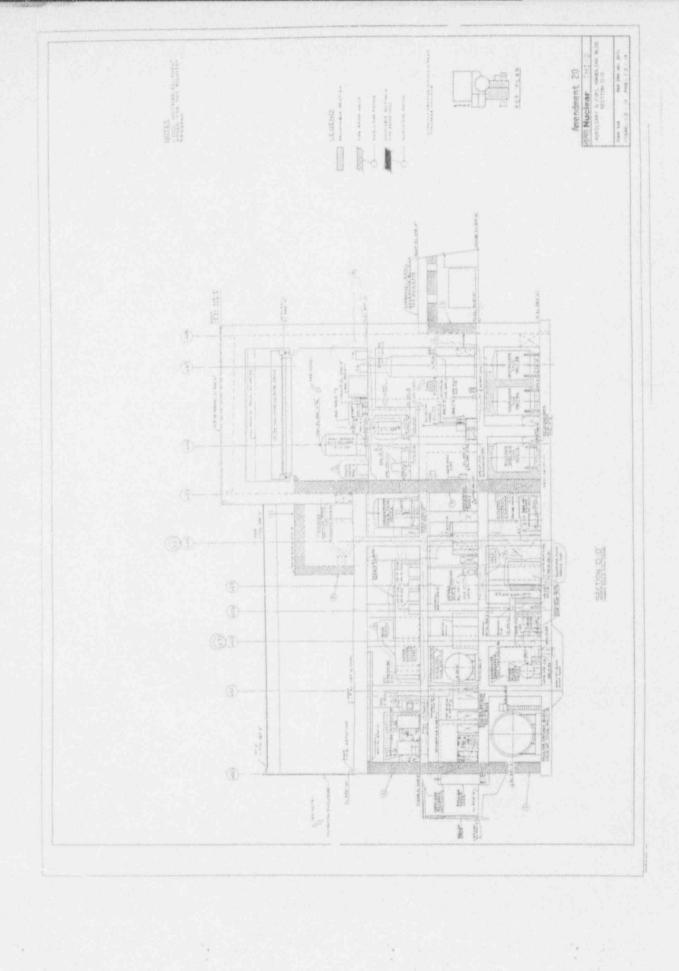


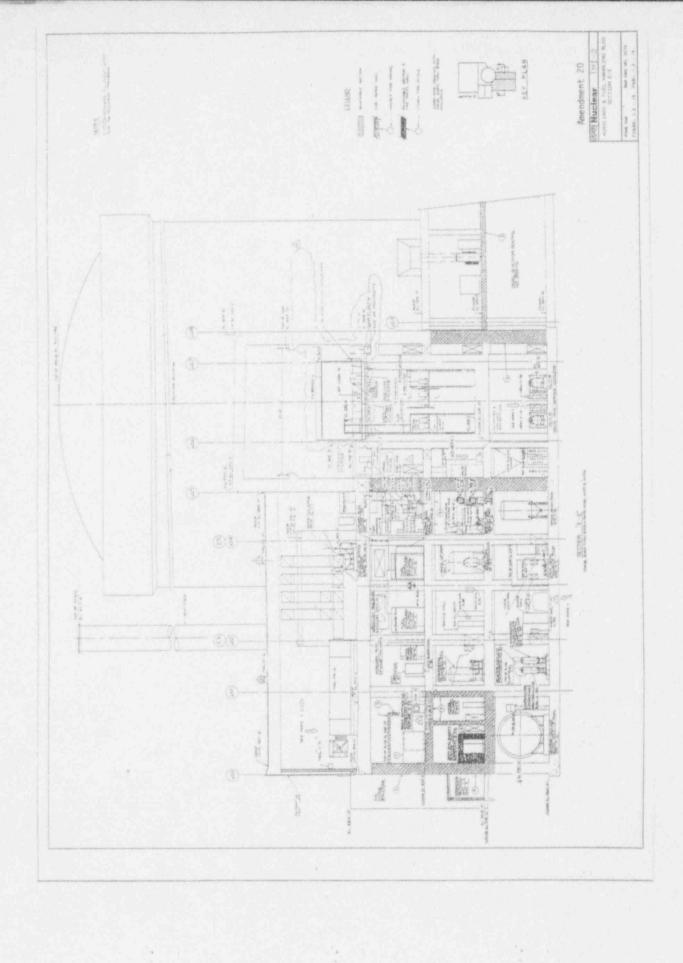


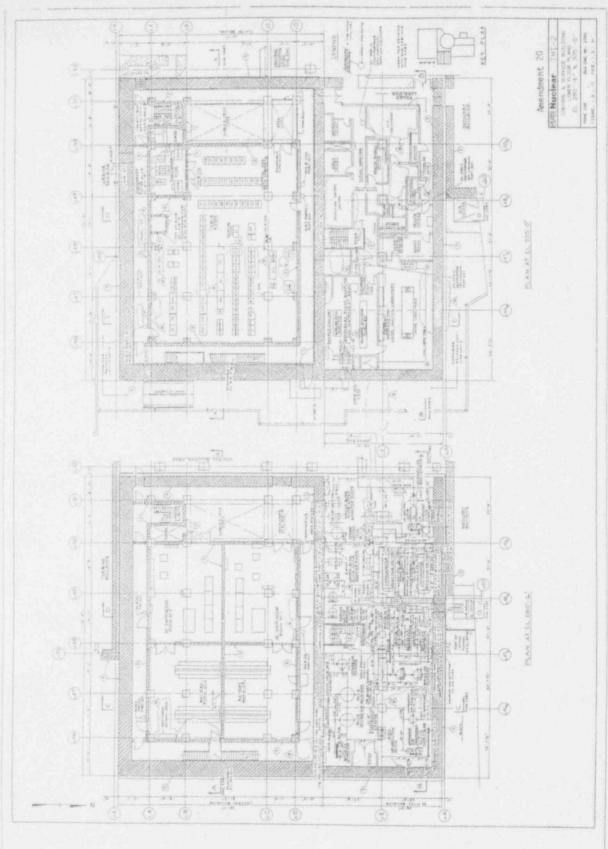


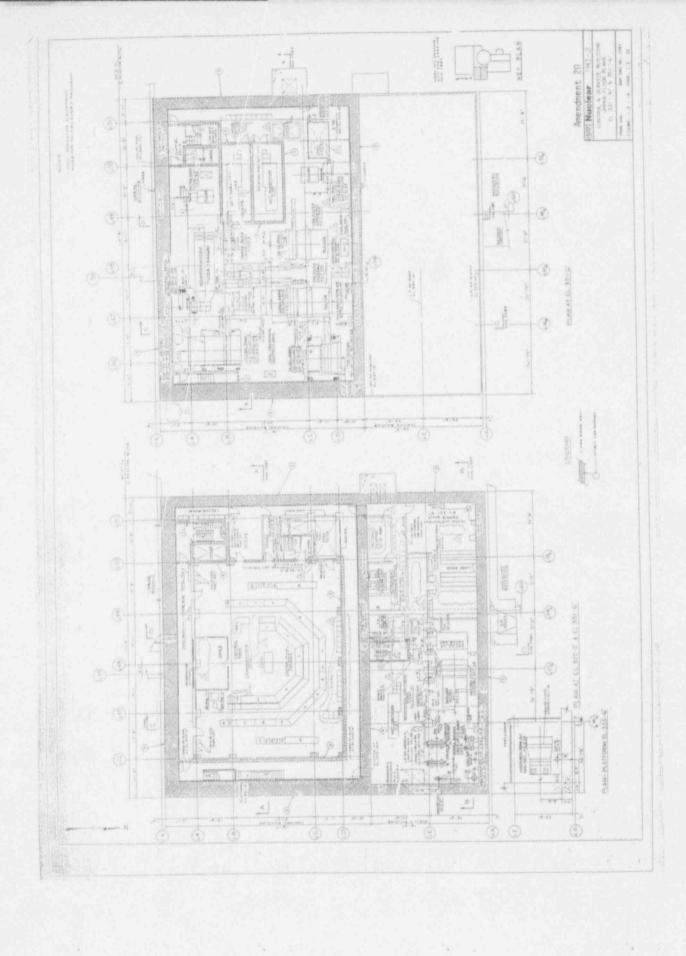


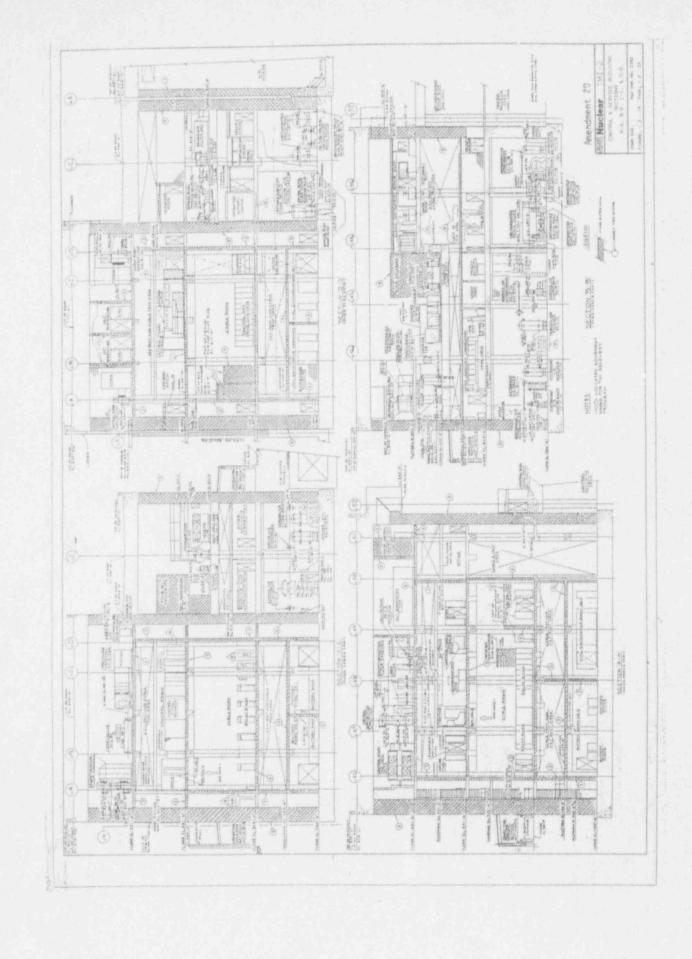


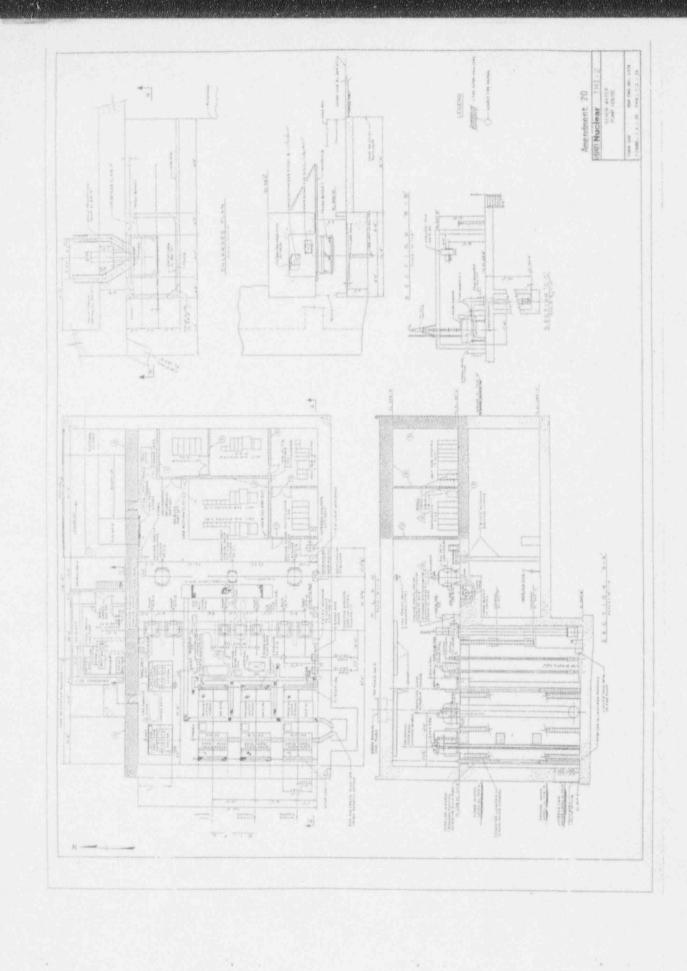


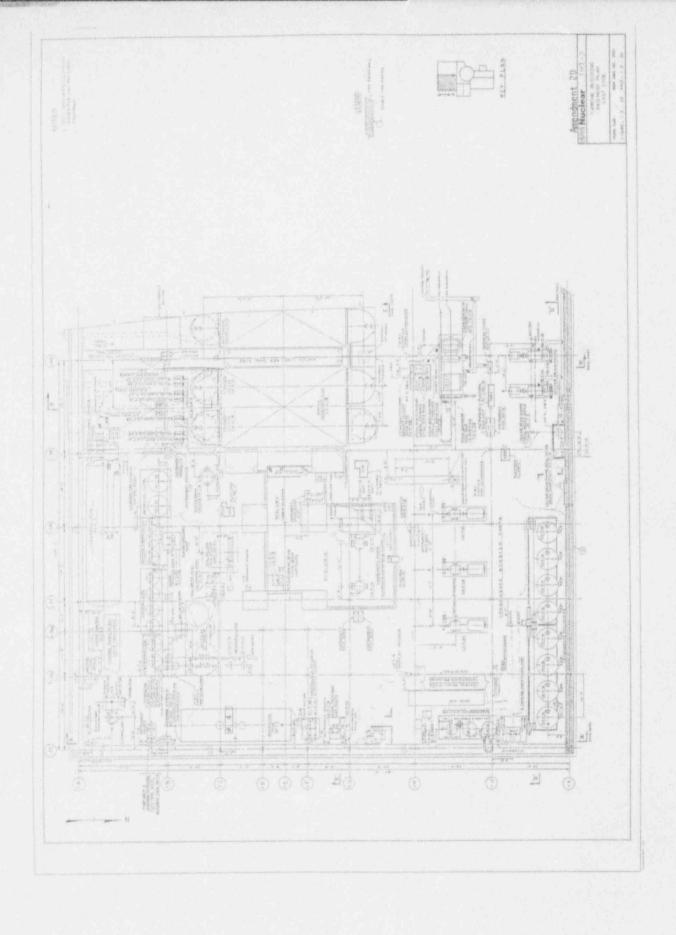


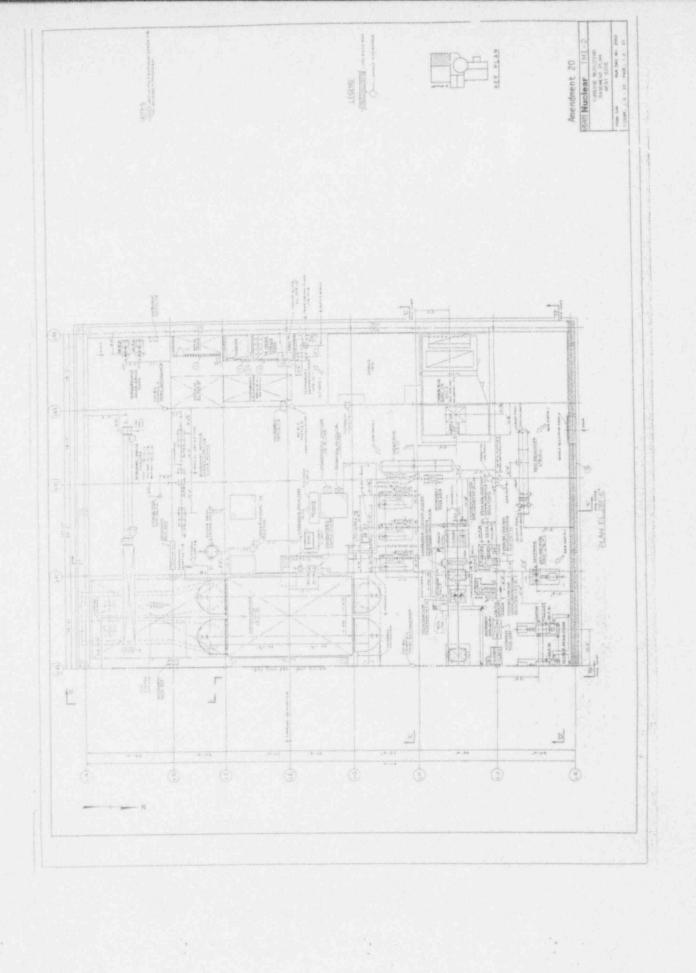


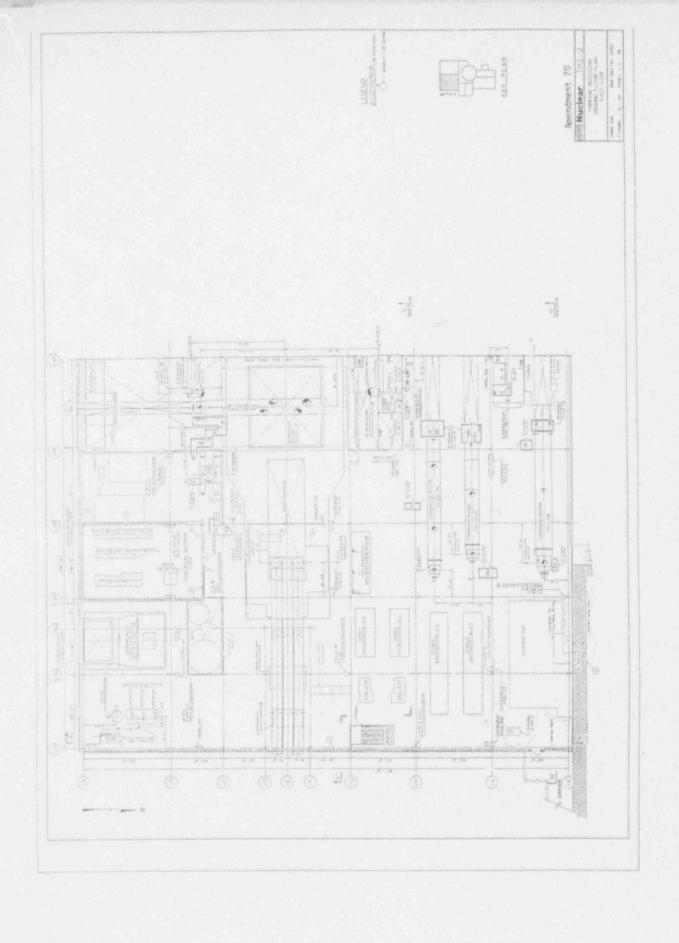


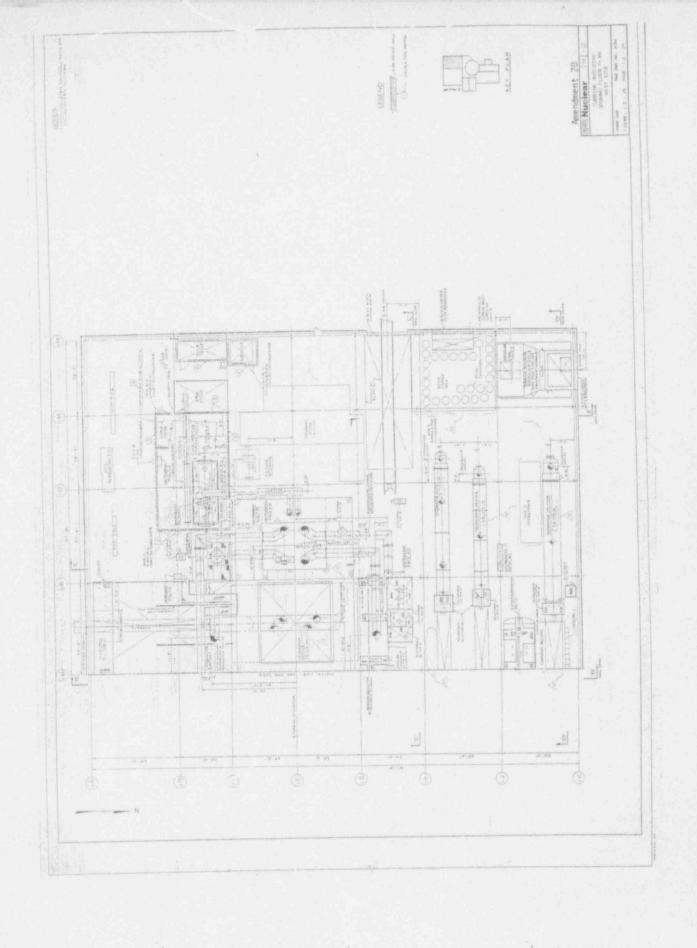


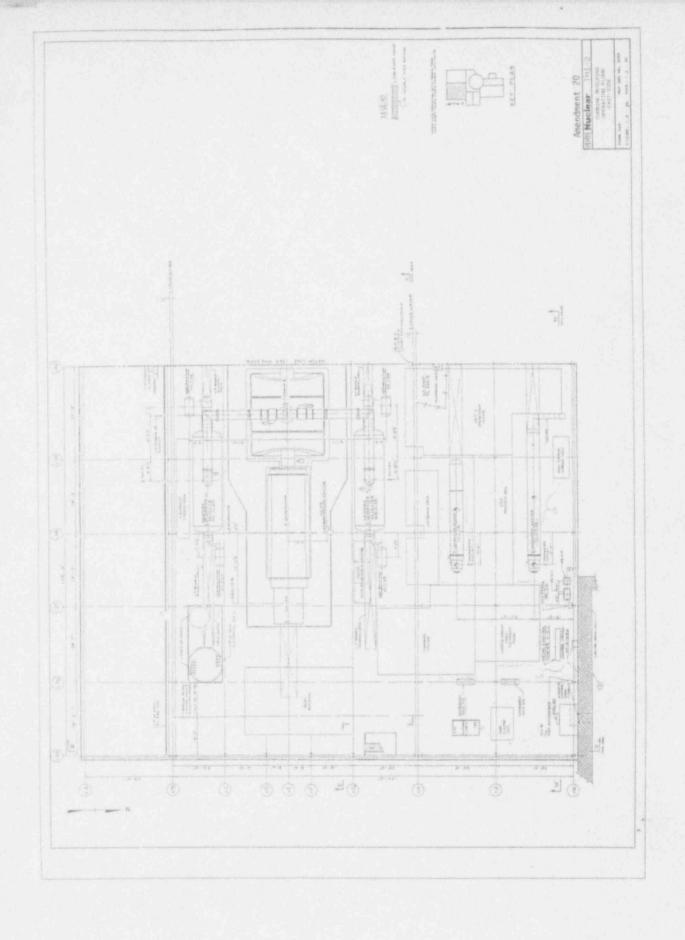


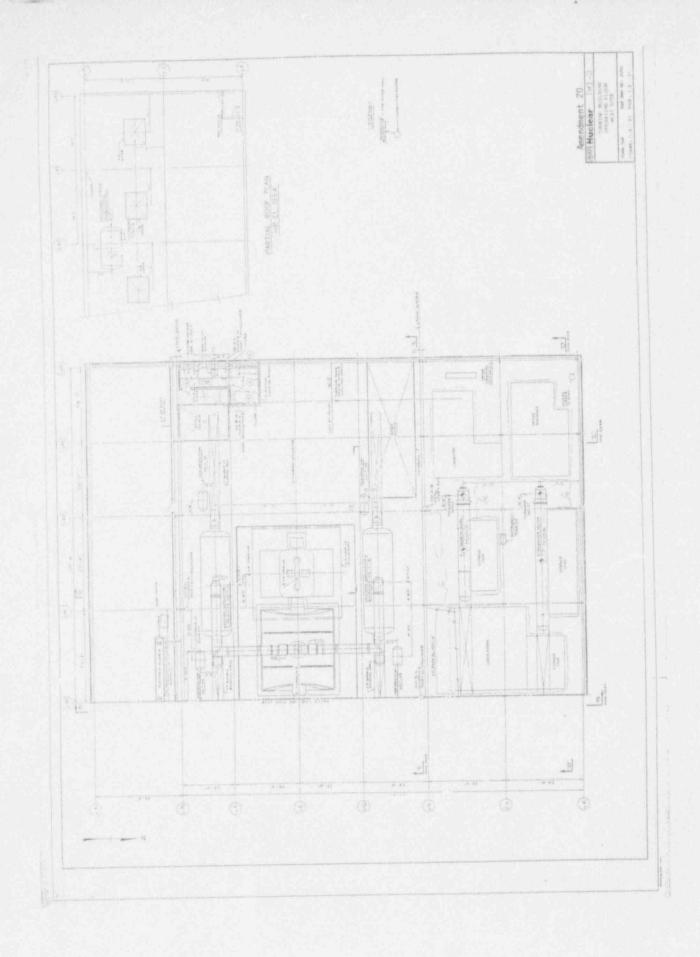




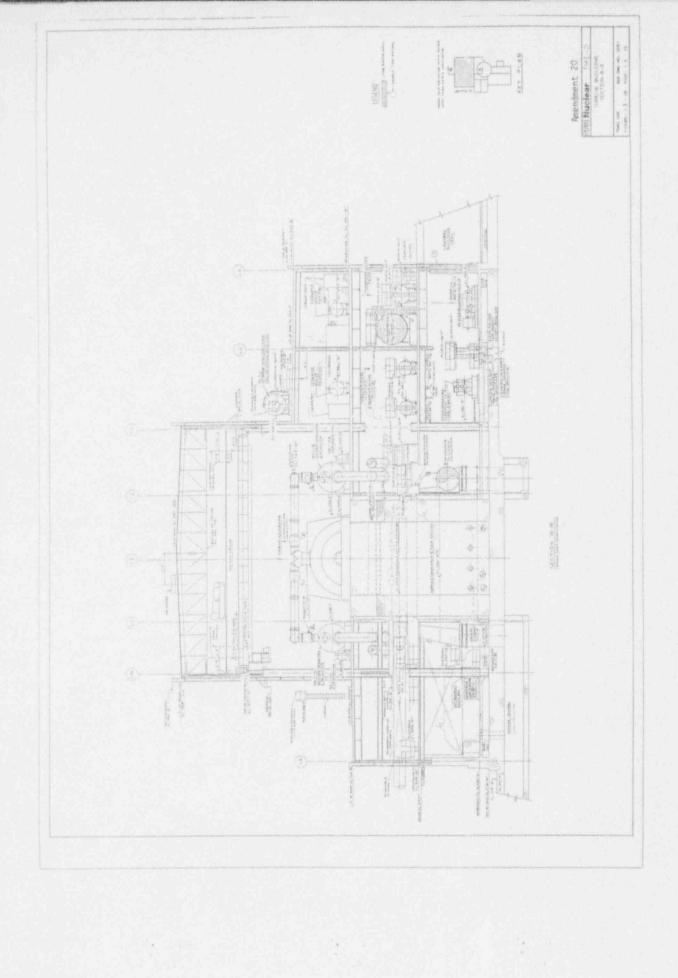


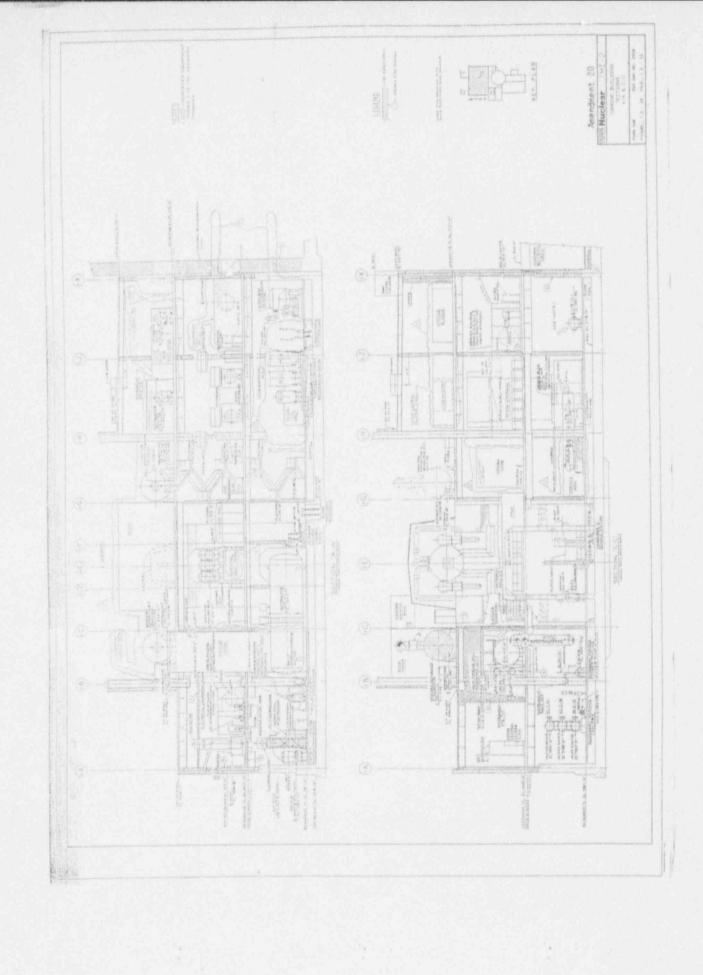


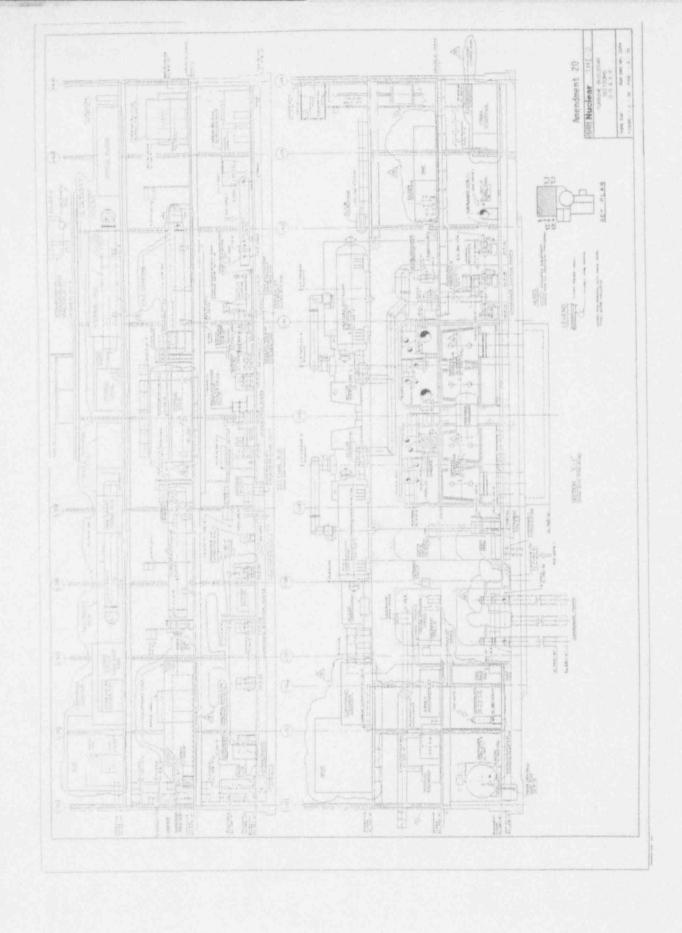


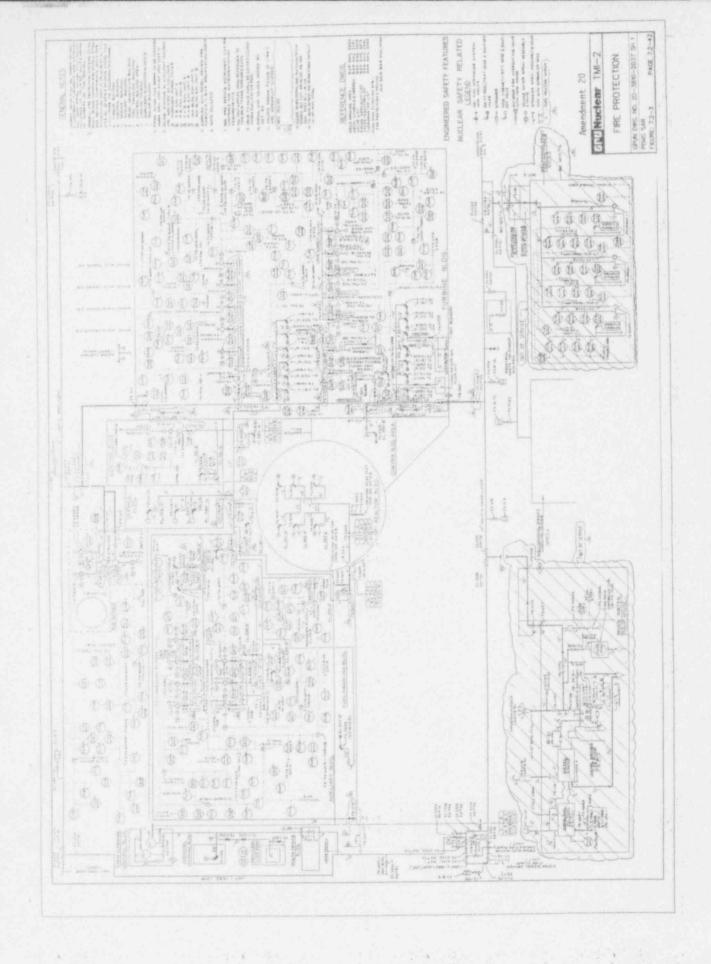


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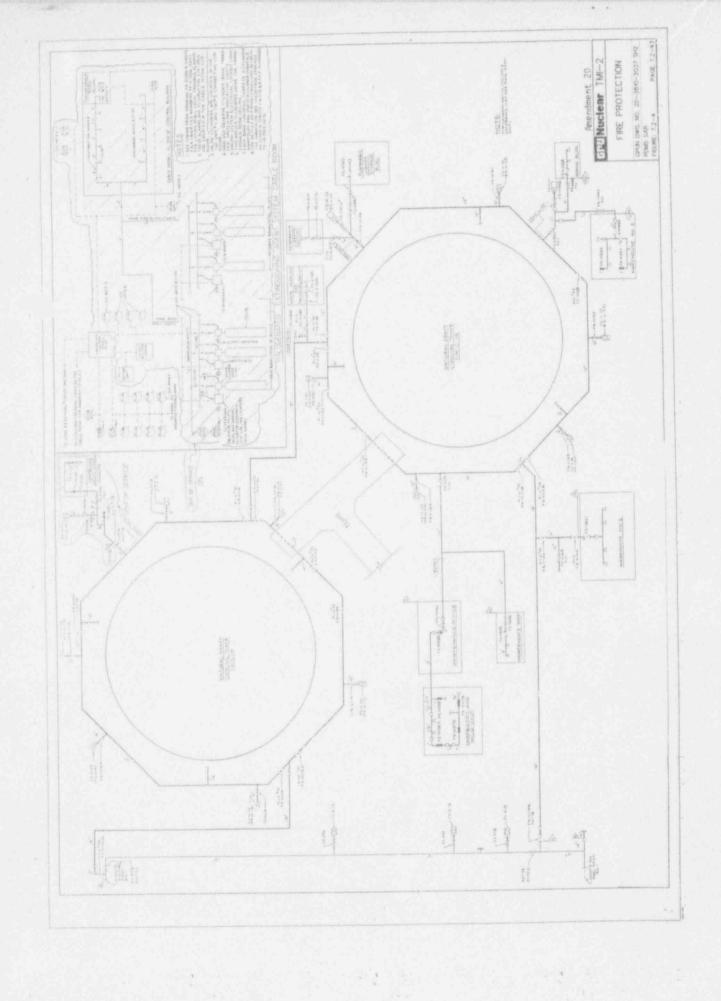


TABLE 1.4-1
FIGURE CROSS REFERENCE

TITLE	B&R DWG. NO.	PDMS SAR FIG. NO.
Site Plan	4001	1.2-1
Reactor Building Basement Floor	2060	1.2-3
Reactor Building Ground Floor	2061	1.2-4
Reactor Building Operating Floor	2062	1.2-5
Reactor Building Section A-A	2063	1.2-6
Reactor Building Sections B-B, C-C, D-D	2064	1.2-7
Auxiliary and Fuel Handling Building, Basement and Sub-Basement Floor	2065	1.2-8
Auxiliary and Fuel Handling Building, Ground Floor	2066	1.2-9
Auxiliary and Fuel Handling Building, First Floor	2067	1.2-10
Auxiliary and Fuel Handling Building, Operating Floor	2068	1.2-11
Auxiliary and Fuel Handling Building, Sections A-A and B-B	2069	1.2-12
Auxiliary and Fuel Handling Building, Section C-C	2070	1.2-13
Auxiliary and Fuel Handling Building, Section D-D	2071	1.2-14
Auxiliary and Fuel Handling Building, Section E-E	2072	1.2-15
Control and Service Building, Lower Floor Plans	2380	1.2-17
Control and Service Building, Upper Floor Plans	2381	1.2-18
Control and Service Building, Sections	2382	1.2-19
River Water Pump House	2338	1.2-20

TABLE 1.4-2

ABBREVIATIONS AND ACRONYMS

ABST Auxiliary Building Sump Tank

ACES Automated Cutting Equipment System

AEC Atomic Energy Commission

AFHB Auxiliary and Fuel Handling Buildings

AGW Accident Generated Water

AISC American Institute of Steel Construction

AIT Air Intake Tunnel

ALARA As Low As Is Reasonably Achievable

ANS American Nuclear Society

ANSI American National Standards Institute

ASME American Society of Mechanical Engineers

ASTM American Society of Testing Materials

ATWS Anticipated Transients Without Scram

AWS American Welding Society

BBR Brown Boveri Reactor

BWST Borated Water Storage Tank

B&R Burns and Roe

B&W Babcock and Wilcox

CACE Containment Air Control Envelope

CCW Closed Cooling Water

CCTV Closed Circuit Television

CFR Code of Federal Regulations

cfs Cubic Feet Per Second

Ci Curie

CRD Control Rod Drive

ABBREVIATIONS AND ACRONYMS

CRDCS Control Rod Drive Control System

CRDM Control Rod Drive Motor

CRDS Control Rod Drive System

CSA Core Support Assembly

DCR Defueling Completion Report

DHCCW Decay Heat Closed Cooling Water

DHR Decay Heat Removal

DOE Department of Energy

DOP Dioctyl Phthalate

DTA Defueling Test Assembly

DTFR Decontamination Task Force Report

DWCS Defueling Water Cleanup System

EPA Environmental Protection Agency

ESF Engineered Safety Features

ETN Exposure Tracking Number

FCN Field Change Notice

FHB Fuel Handling Building

FPPE Fire Protection Program Evaluation

FSAR Final Safety Analysis Report

FTC Fuel Transfer Canal

GDC General Design Criteria

GI Gastrointestinal

gpm Gallons Per Minute

GPU General Public Utilities

GPUN GPU Nuclear Corporation

GPUNC GPU Nuclear Corporation

TABLE 1.4-2 (Cont'd) ABBREVIATIONS AND ACRONYMS

GRC General Review Committee

H&V Heating and Ventilation

HEPA High Efficiency Particulate Air

HEU Highly Enriched Uranium
HIC High Integrity Container

HIC High Integrity Container

HVAC Heating, Ventilating, and Air Conditioning

IAEA International Atomic Energy Agency
INEL Idaho National Engineering Laboratory

IOSRG Independent Onsite Safety Review Group

IWTS Industrial Waste Treatment System

JCP&L Jersey Central Power and Light

LCSA Lower Core Support Assembly

LER Licensee Event Report

LLD Lowest Level of Detection

LOCA Loss of Coolant Accident

MDHR Mini-Decay Heat Removal

MET-ED Metropolitan Edison Company

MIDAS Meteorological Information and Dose

Assessment System

MPC Maximum Permissible Concentration

mph Miles Per Hour

MSIV Main Steam Isolation Valve

MSR Moisture Separator Reheater

MUP Makeup and Purification

MWHT Miscellaneous Waste Holdup Tank

NFPA National Fire Protection Agency

ABBREVIATIONS AND ACRONYMS

NLB National Liquid Blasting

NPDES National Pollutant Discharge Elimination

System

NRC Nuclear Regulatory Commission

NSAC Nuclear Safety Analysis Center

NTU Nephelometric Turbidity Index

ODCM Off-site Dose Calculation Manual

OMB Office of Management and Budget

ORNL Oak Ridge National Laboratory

OTSG Once Through Steam Generator

PAF Personnel Access Facility

PDMS Post-Defueling Monitored Storage

PDSR Post-Defueling Survey Report

PEIS Programmatic Environmental Impact Statement

PENELEC Pennsylvania Electric Company

PMF Probable Maximum Flood

PORC Plant Operations Review Committee

PORV Pilot Operated Relief Valve

PSAR Preliminary Safety Analysis Report

psi Pounds Per Square Inch

P&ID Piping and Instrument Diagram

QA Quality Assurance

RAF Radiation Area Factor

RB Reactor Building

RC Reactor Coolant

RCBT Reactor Coolant Bleed Tank

RCMM Remote Controlled Mobile Manipulator

ABBREVIATIONS AND ACRONYMS

RCP Reactor Coolant Pump

RCS Reactor Coolant System

RCTV Remote Controlled Transport Vehicle

RPS Reactor Protection System

RRV Remote Reconnaissance Vehicle

RV Reactor Vessel

RWP Radiation Work Permit

SAR Safety Analysis Report

SCBA Self-Contained Breathing Apparatus

sccm Standard Cubic Centimeters per Minute

scfm Standard Cubic Feet Per Minute

SD System Description

SDS Submerged Demineralizer System

SEEDS Simplified Environmental Effluent Dosimetry System

SER Safety Evaluation Report

SFAS Safety Features Actuation System

SFML Safe Fuel Mass Limit

SFP Spent Fuel Pool

SG Steam Generator

SISI System In-Service Inspection

SNM Special Nuclear Material

SPC Standby Pressure Control

SRP Standard Review Plan

SSCCW Secondary Side Closed Cooling Water

STP Sewage Treatment Plant

TER Technical Evaluation Report

ABBREVIATIONS AND ACRONYMS

TLD Thermoluminescent Dosimeter

TMI Three Mile Island

TMINS Three Mile Island Nuclear Station

TRVFS Temporary Reactor Vessel Filtration System

USAR Updated Safety Analysis Report

USGS U. S. Geological Survey

UTM Universal Transmeridian

WDG Waste Disposal Gas

WDL Waste Disposal Liquid

WDS Waste Disposal Solid

WHPF Waste Handling and Packaging Facility

APPENDIX 1A

POTENTIAL REDUCTIONS IN OCCUPATIONAL EXPOSURE DUE TO POST-DEFUELING MONITORED STORAGE

[NOTE: The following is a historical treatise that discusses the results of the Decontamination Task Force Report (DTFR) (Reference 2) conducted in 1985. The DTFR provides an evaluation of the reduction in occupational exposure attributed to PDMS. The actual radiological conditions existing in December 1993, i.e., at the time of entry into PDMS, as given in Section 5, have a negligible impact on the conclusions reached by this study. This Appendix will remain in its current condition to maintain that historical perspective. No further attempt will be made to be consistent with the rest of the SAR as it is revised.]

1A.1 SUMMARY AND INTRODUCTION

1A.1.1 SUMMARY

A comprehensive evaluation of the person-rem associated with additional required decontamination of the TMI-2 plant after completion of the "Cleanup Program" (i.e., Phase III Endpoint) has determined that deferring this decontamination for a period of 30 years will result in a potential occupational exposure savings in the range of 4,500 to 9,800 person-rem. In calculating this savings, person-rem resulting from decontamination tasks, radioactive waste processing tasks, and exposures due to tasks performed during PDMS were estimated. Table 1A-10 contains a summary of the estimated range of person-rem for both immediate additional decontamination and final decontamination as a part of decommissioning, assuming a 30-year period of PDMS.

1A.1.2 INTRODUCTION

Following the completion of the prerequisites identified in Section 1.1.2.1 of the PDMS SAR, the TMI-2 plant will enter PDMS. To enter this mode, the TMI-2 plant must be in a safe, stable condition so that it does not pose a risk to the health or safety of the public. GPU Nuclear has determined that by deferring any remaining decontamination until after PDMS, a significant savings in the occupational radiation exposures will be realized. The difference in occupational exposure as a result of performing these tasks after a period of PDMS (final decontamination as a part of decommissioning) instead of at the end of Phase III (immediate additional decontamination) is based on:

- Reduction in radiation dose rates due to the natural decay of radioactive materials remaining in the plant;
- o Advances in remote technology directly applicable to final cleanup activities;
- o Advances in chemical decontamination methods; and
- A longer development period to plan, engineer and, in some cases, perform further decontamination activities.

This report quantifies the potential savings in occupational exposure which might be realized due to delaying the final decontamination until after the PDMS period. The evaluation performed considers two cases: "immediate additional decontamination" (i.e., immediately after Phase III) and "final decontamination as a part of decommissioning" after PDMS; the delay is assumed to be approximately 30 years. Neither case calculates person-rem exposures for normal decommissioning activities. This report describes the plant conditions assumed to exist both before and after decontamination activities. These conditions form the basis for the dose rates used in the person-rem evaluation. The basis for the job-hour estimates used in the analysis are also provided in this report. This study is considered a reasonable estimate of the potential person-rem savings associated with PDMS based on available information.

In addition to the two cases listed above, person-rem are also evaluated assuming final decontamination as a part of decommissioning after a PDMS period of 20 years. This case is included to facilitate comparison with the person-rem stated in Supplement 3 of the Programmatic Environmental Impact Statement (Reference 1), which assumes a PDMS duration of 20 years followed by 4 years of final decontamination. It is not the plan of GPU Nuclear to have a PDMS period of 20 years nor has GPU Nuclear specified a duration for completing the decontamination activities, except that PDMS shall not continue beyond the time of decommissioning TMI-1.

This study should not be interpreted to imply a commitment by GPU Nuclear to employ specific decontamination techniques, nor to achieve specific endpoint radiological conditions during final decontamination.

1A.2 BACKGROUND INFORMATION

1A.2.1 RECOVERY TASKS

Decontamination and dose reduction activities have been conducted continuously during the TMI-2 cleanup period. Major tasks that have been performed are:

- o Decontamination Task Force Report (Reference 2)
- o Gross Decontamination Experiment (Reference 12)
- o Dose Reduction Working Group Tasks
- o Auxiliary and Fuel Handling Buildings (AFHB) decontamination
- o Reactor Building (RB) decontamination

In general, these tasks have been geared to ensuring that the recovery tasks, including stabilizing the plant and defueling, were performed in a radiological environment that ensured occupational exposures were ALARA. During the cleanup period, the priority tasks were those associated with removing the nuclear fuel from the plant. These tasks were important as they reduced the risk to public health and safety.

5.3 PDMS RADIOLOGICAL SURVEY

This section describes the radiological conditions at the TMI-2 facility upon entering PDMS. These conditions are expressed in terms of general area dose rate, loose surface contamination, and general isotopic distribution. The data is presented in a format consistent with the specific decontamination criteria introduced in Section 5.2.

5.3.1 RADIOLOGICAL ASSESSMENT

Upon completion of cleanup activities (including decontamination) in a given area or cubicle, the area was isolated to prohibit uncontrolled access. Deactivated systems traversing the area or cubicle were drained, vented, and isolated. The subject area was, at that point, configured for long-term monitored storage and available for a final PDMS radiological assessment. This assessment was performed utilizing radiological surveys (in this case, radiation, contamination and air activity surveys performed by radiological controls technicians) as a basis for determining whether the established decontamination program endpoints were achieved as well as to document the radiological conditions which existed upon entering PDMS. If at the conclusion of the radiological assessment it was determined that satisfactory radiological conditions were not achieved, additional decontamination efforts were undertaken or exceptions to the goals were taken.

5.3.1.1 Pre-PDMS Radiological Survey Methodology

Radiation contamination and air activity surveys were routinely performed during the course of the cleanup program in support of work activities. These surveys were performed in accordance with regulatory and industry standards and practices to verify and document radiation and contamination levels for use in controlling personnel exposure. These surveys were then evaluated as to whether or not they supported the conclusion that decontamination endpoints had been achieved. In those instances where existing surveys were judged unsuitable for substantiating decontamination endpoints, additional surveys were conducted.

5.3.1.2 Post-PDMS Radiological Survey Methodology

During the PDMS period, radiological conditions within the facility will be monitored through sampling and periodic surveillance. Surveillance activities for the Reactor Building consist of radiation surveys in conjunction with planned Reactor Building inspections. The purpose for conducting these surveys is to provide assurance that conditions are stable or to provide early indication of any changing conditions which may require corrective action. The Radiological Survey Plan for PDMS is described in Section 7.2.4.2.

5.3.1.3 Remedial Decontamination Activities

In the event that changing conditions are indicated, an evaluation will be performed as to the need for, and form of, corrective action to be taken. In general, areas will be assessed on a case-by-case basis with the deciding factors being the area's impact on personnel exposure and the possibility of a release to the environment. The Unit 2 PDMS organization will be staffed to provide the capability to take corrective action or call upon additional resources necessary to take corrective action.

5.3.2 RADIOLOGICAL CONDITIONS AT BEGINNING OF PDMS

Table 5.3-1 lists the specific radiological goals for the TMI-2 Reactor Building and the corresponding radiological conditions as of the most current radiological surveys existing in September 1992. The RB radiological conditions listed in Table 5.3-1 reflect rounded-off, average PDMS survey data for the entire cubicle/area in question. These data were compiled in the manner described in Section 5.3.1.1.

Table 5.3-2 lists the equivalent information for the AFHB as of November 1993.

Table 5.3-3 provides a summary of the radiological conditions for the balance-of-plant areas not covered by Tables 5.3-1 and 5.3-2.

5.3.2.1 Surface Contamination At Beginning Of PDMS

To establish a baseline at the beginning of PDMS, the radioactivity present as surface contamination in various areas of the facility has been evaluated. This information serves as an initial reference for the evaluation of any future activities in the respective areas.

In order to appraise the radioactivity present as loose surface contamination upon entry into PDMS, an analytical model was constructed utilizing available loose surface contamination data, generalized waste stream isotopic distributions and estimates of surface area. This information is formatted in a manner similar to the general area dose rate and loose surface contamination data presented in Tables 5.3-1, 5.3-2, and 5.3-3. Only surface contamination was considered; fixed contamination or contamination internal to piping systems or equipment was omitted. The generalized waste streams or distribution of principal isotopes are referenced on each of the tables.

Table 5.3-4 lists the data obtained from the analytical model described above for the TMI-2 Reactor Building. Table 5.3-5 lists the equivalent data for the AFHB and Table 5.3-6 provides a similar summary for the balance-of-plant areas. All of the calculations of the quantities of curies listed are based on the specific decontamination goals given on Tables 5.2-2 and 5.2-3.

TABLE 5.3-5

SURFACE CONTAMINATION - AFHB

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTO	OPES (1)	CURIES (2)
AX001	RB Emerg. Cooling Booster Pumps Area	С		1.82E-3
AX002	Access Corridor	В		5.45E-5
AX002a	N ₂ Piping System	C		6.67E-6
AX003	Access Area	C		9.35E-4
AX004	Seal Injection Valve Rm	В		9.33E-3
AX005	MUP Pump 1C Rm	В		4.36E-3
AX006	MUP Pump 1B Rm	A		9.54E-3
AX007	MUP Pump IA Rm	В		1.00E-3
AX008	Spent Resin Storage Tank 1B Rm	В		1.30E-1
AX009	Spent Resin Storage Tank 1A Rm	В		2.54E-1
AX010	Spent Resin Transfer Pump Rm	В		6.74E-2
AX011	Aux Bldg Sump Tank Pumps and Valve Rm	В		1.18E-4
AX012	Aux Bldg Sump and Tank Rm	В		3.97E-2
AX013	Evap Cond Tanks, Pumps and Demins Rm	В		2.31E-5
AX014	RC Evaporator Rm	A		2.27E-3
AX015a	Cleanup Filters Rm	A		3.78E-4
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5.3-12

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CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	CURIES (2)
AX015b	Cleanup After Filters Rm	A	7.71E-4
AX016	Cleanup Demineralizer 2A Rm	A	1.23E-3
AX017	Cleanup Demineralizer 2B Rm	A	6.03E-4
AX018	Waste Transfer Pumps Rm	В	1.06E-3
AX019	Waste Disposal Liquid Valve Rm	A	7.94E-4
AX020	RC Bleed Holdup Tanks 1B and 1C Rm	A	3.05E-1
AX021	RC Bleed Holdup Tank 1A Rm	В	7.97E-4
AX022	North Stairwell	В	2.80E-5
AX023	Elevator Pit and Associated Equipment	В	1.01E-3
AX024	Aux Bldg Sump Filters Rm	В	1.78E-4
AX025	Area Between Service, Control, and RB	В	1.73E-4
AX026	Seal Injection Filters Rm	C	1.90E-4
AX027	South Stairwell	В	1.71E-5
AX101	Radwaste Disposal Control Panel Area	В	1.96E-5
AX102	RB Sump Pumps Filters Rm	В	2.61E-4
AX103	Motor Control Center 2-11EB Rm	C	2.88E-5

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	CURIES (2)
AX104	Motor Control Center 2-21EB Rm	В	3.03E-5
AX105	Substation 2-11E Rm	В	7.10E-5
AX106	Substation 2-21E Rm	В	8.04E-5
AX107	Motor Control Center 2-11EA Rm	В	8.94E-5
AX108	Motor Control Center 2-21EA Rm	A	6.46E-5
AX109	Nuclear Services Coolers and Pumps Area	В	3.42E-5
AX110	Intermediate Coolers Area	C	3.54E-5
AX111	Intermed Cooling Pumps and Filters Rm	В	7.16E-5
AX112	Seal Return Coolers and Filter Rm	В	2.43E-2
AX113	Waste Gas Analyzer Rm	В	2.97E-3
AX114	MUP Demineralizer 1A Rm	В	5.99E-4
AX115	MUP Demineralizer 1B Rm	В	2.78E-3
AX116	Makeup Tank Rm	A	2.15E-2
AX117	MUP Filters Rm	С	2.58E+1
AX118	Spent Fuel Coolers and Pumps Area	С	2.89E-4

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	CURIES (2)
AX119	Spent Fuel Demineralizer Rm	В	2.81E-5
AX120	Spent Fuel Filters Rm	A	9.33E-6
AX121	Inside Elevator Cab	B	1.14E-5
AX122	North Stairwell	В	2.95E-5
AX123	Access Area	В	9.45E-5
AX124	Concentrated Liquid Waste Pump Rm	В	1.09E-4
AX125	Waste Gas Decay Tank 1B km	В	1.92E-4
AX126	Waste Gas Filter Rm	В	4.75E-6
AX127	Waste Gas Decay Tan!. 1A Rm	В	1.17E-3
AX128	Valve and Instrument Rm	В	8.02E-5
AX129	Deborating Demineralizer 1B Rm	В	5.80E-5
AX130	Deborating Demineralizer 1A Rm	В	3.21E-5
AX131	Miscellaneous Waste Holdup Tank Rm	В	2.69E-4
AX132	Corridor Between Unit 1 and Unit 2	В	1.47E-4
AX133	South Stairwell	В	2.41E-5
AX134	Miscellaneous Waste Tank Pumps Rm	A	1.38E-3

CUBIC		PRINCIPAL ISOTOPES (1)	CURIES (2)
AX135	Radwaste Disposal Control Panels	В	4.61E-6
AX201	North Stairwell	В	2.54E-5
AX202	Elevator Shaft	В	2.16E-5
AX203	4160V Switchgear 2-1E Rm	В	1.05E-4
AX204	4160V Switchgear 2-2E Rm	В	1.09E-4
AX205	RB Purge Air Sup. and Hy Ctrl Exh Area	A	3.95E-5
AX206	RB Purge Air Exhaust Unit B	В	1.41E-2
AX207	RB Purge Air Exhaust Unit A	В	1.56E-2
AX208	Aux Bldg Exhaust Unit B	В	2.42E-4
AX209	Aux Bidg Exhaust Unit A	В	6.24E-4
AX210	Fuel Handling Bldg Exhaust Unit B	В	6.06E-4
AX211	Fuel Handling Bldg Exhaust Unit A	В	3.56E-4
AX212	Decay Heat Surge Tk and Substation Area	В	6.33E-5
AX213	Unit Substations and Access Area	C	8.11E-5
AX214	Decon Facility	C	1.68E-4
AX215	Fuel Handling Bldg Supply Unit	c	2.80E-5

SURFACE CONTAMINATION - AFHB

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	CURIES (2)
AX216	Aux Bldg Supply Unit	В	3.36E-5
AX217	Access Area	В	6.94E-5
AX218	Concentrated Waste Storage Tank Rm	В	1.44E-4
AX219	Inst Racks and Atmospheric Monitor Area	В	6.39E-5
AX220	Caustic Liquids Mixing Area	В	4.28E-5
AX221	Caustic Liquids Mixing Area Corridor	В	1.12E-4
AX222	South Stairwell	В	4.89E-6
AX223	Air Handling Units General Area	C	3.79E-4
AX301	Elevator Machine Rm	C	5.67E-6
AX302	North Stairwell	В	2.40E-5
AX303	Elevator and Stairwell Access	C	4.83E-5
AX304	Auxiliary Building Exhaust Fan #8	C	2.22E-5
AX305	Fuel Handling Building Exhaust Fan #10	A	1.94E-5
AX401	Roof	A	1.54E-4
AX402	Cooling Water Surge Tanks Rm	C	1.55E-5
AX403	Damper Rm	В	1.26E-5

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CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	CURIES (2)
AX501	RB Spray Pump 1A Rm	A	2.98E-2
AX502	RB Spray Pump 1B Rm	В	8.56E-3
AX503	Decay Heat Remov Cooler and Pump 1A R	m A	8.08E-3
AX504	Decay Heat Remov Cooler and Pump 1B R	m A	2.67E-3
FH001	Makeup Suction Valve Rm	C	1.57E-2
FH002	Access Corridor	С	2.17E-4
FH003a	Makeup Discharge Valve Rm	В	3.45E-3
FH003b	Makeup Discharge Valve Rm	В	1.75E-2
FH004	Westinghouse Valve Rm	C	6.66E-3
FH005	Mini Decay Heat Vault	В	8.61E-5
FH006	Decay Heat Service Coolers Area	В	4.48E-4
FH007	Neutrl and Recl Boric Acid Access Area	В	4.50E-5
FH008	Neutralizer Tanks Pumps Rm	В	2.17E-3
FH009	Neutralizer Tanks Rm	В	2.94E-3
FH010	Reclaimed Boric Acid Tank Rm	A	1.97E-4

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	CURIES (2)
FH011	Reclaimed Boric Acid Pump Rm	A	9.16E-4
FH012	Neutralizer Tanks Filters Rm	В	4.29E-5
FH013	Oil Drum Storage Area	В	4.49E-6
FH014	Annulus	A	5.22E-3
FH101	MUP Valve Rm	В	1.14E-1
FH102	East Corridor	В	5.67E-4
FH103	Sample Rm	В	2.40E-4
FH104	West Corridor	С	3.20E-5
FH105	Model Rm	В	4.38E-4
FH106	Monitor Tanks and Sample Sink Area	C	7.08E-5
FH107	Trash Compactor Area	В	5.62E-6
FH108	Truck Bay	A	5.46E-5
FH109	Spent Fuel Pool A	C	1.35E+2
FH110	SDS Spent Fuel Pool	C	4.62E-2
FH111	Fuel Cask Storage	C	1.14E-2
FH112	Annulus	В	4.39E-4
FH201	East Corridor	В	1.51E-4
FH202	West Corridor	В	1.07E-4

SURFACE CONTAMINATION - AFHB

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES (1)	_CURIES_(2)
FH203	Surge Tank Area	В	4.35E-5
FH204	Standby Pressure Control Area	C	2.36E-4
FH205	Annulus	В	7.24E-5
FH301	Upper Spent Fuel Pool A Area	C	5.30E-5
FH302	SDS Operating Area	В	1.53E-4
FH303	Upper Standby Pressure Control Area	C	1.92E-4
FH304	Annulus	В	6.05E-4
FH305	Spent Fuel Pool Access Area	C	2.65E-4

NOTES:

(1) The principal isotopes and their relative distribution are defined below. The Sr-90 value represents the sum of the Sr-90 and Y-90 isotopes which are in equilibrium; the Cs-137 value represents the sum of the Cs-137 and Ba-137m isotopes which are in equilibrium. The "A", "B", and "C" categories relate to normal, makeup, and defueling waste streams, respectively. Only those isotopes important from an offsite dose perspective are included.

A		В		C	
Sr-90	0.08	Sr-90	0.29	Sr-90	0.63
Cs-137	0.92	Cs-137	0.71	Cs-137	0.28
Pu-238	4.43E-6	Pu-238	1.67E-5	Pu-238	4.25E-4
Pu-239	5.39E-5	Pu-239	2.04E-4	Pu-239	5.18E-3
Pu-240	1.43E-5	Pu-240	5.41E-5	Pu-240	1.37E-3
Pu-241	4.86E-4	Pu-241	1.84E-3	Pu-24!	0.04
Am-241	1.56E-5	Am-141	5.92E-5	Am-141	1.50E-3
				Pm-147	0.04

⁽²⁾ These are calculated values based on the specific decontamination values given on Table 5.3-2.

TABLE 5.3-6 SURFACE CONTAMINATION - OTHER BUILDINGS

CUBICLE NUMBER	AREA DESCRIPTION	PRINCIPAL ISOTOPES(1)	CURIES(2)
SB000	Service Building El. 281'	A	1.31E-4
SB002	M-20 Area	A	1.16E-4
SB002	M-20 Area Sump	A	1.04E-5
SB100	Service Building El. 305' [RB Containment Control Cubicle] [Secondary Chem Lab]	A B B	7.23E-5 5.72E-5 3.81E-4
SB500	Tendon Access Gallery	A	1.22E-4
TB000	Turbine Building El. 281'	A	5.90E-4
PA108	CACE Building	В	2.69E-5
RA101	PWST Pump House [PWST Sump]	A A	2.72E-5 2.53E-6
RA104	BWST Area	A	2.92E-5

NOTES:

(1) The principal isotopes and their relative distribution are defined below. The Sr-90 value represents the sum of the Sr-90 and Y-90 isotopes which are in equilibrium; the Cs-137 value represents the sum of the Cs-137 and Ba-137m isotopes which are in equilibrium. The "A" category relates to the normal waste stream. Only those isotopes important from an offsite dose perspective are included.

	A	, i	}
Sr-90	0.08	Sr-90	0.29
Cs-137	0.92	Cs-137	0.71
Pu-238	4.43E-6	Pu-238	1.67E-5
Pu-239	5.39E-5	Pu-239	2.04E-4
Pu-240	1.43E-5	Pu-240	5.41E-5
Pu-241	4.86E-4	Pu-241	1.84E-3
Am-241	1.56E-5	Am-141	5.92E-5

(2) These are calculated values based on the specific decontamination values given on Table 5.3-3.

- a. Provided a source of processed water makeup for various tanks (e.g., BWST, WDL-T-9A/9B, FTC, SFP "A").
- b. Provided a source of processed water inside the RB via penetration R-565.

6.2.37.2 PDMS Function

This system provides no active function during PDMS. The passive function provided by this system during PDMS is contamination control. Contamination within the system is controlled by the isolation of the boundary valves for the contaminated portions of the system.

6.2.38 OTSG RECIRCULATING SYSTEM

6.2.38.1 System Design

The OTSG Recirculating System was designed and installed during the TMI-2 cleanup period. The primary function was to:

- 1. Remove radioactivity from steam generator RC-H-1B (OTSG "B") and,
- Chemically treat water in both steam generators (RC-H-1A, 1B) for wet-layup condition.

6.2.38.2 PDMS Function

This system provides no active function during PDMS. The passive functions provided by this system are Containment isolation and contamination control. The Containment isolation function is provided by maintaining valves GR-V1A, 1B, GR-V7A and 7B in the closed position. Contamination within the system is controlled by the isolation of the boundary valves for the contaminated portions of the system.

6.2.39 DECONTAMINATION SERVICE AIR SYSTEM

6.2.39.1 System Design

The function of the Decontamination Service Air System was to supply a source of air (in addition to the existing service air system) to:

- The Unit 2 Reactor Building for support of work activities.
- b. The Unit 2 AFHB for operation of decontamination equipment.

6.3 DEACTIVATED SYSTEMS

The section provides a description of those systems which are deactivated because they serve no active or passive function during PDMS. Table 6.3-1 lists the deactivated systems for the TMI-2 facility and their PDMS status. All deactivated systems require no maintenance and serve no active or passive function during PDMS. No attempts will be made to preserve or maintain these systems. Each of these systems is described in the following sections.

6.3.1 AUXILIARY STEAM SYSTEM

The Auxiliary Steam System was designed to supply process steam to the following equipment:

- a. Reactor Coolant Evaporator
- b. 13th Stage Feedwater Heaters FW-J-2A and FW-J-2B
- c. Turbine Gland Seal Steam System
- d. Turbine Driven Emergency Steam Generator Feed Pump
- e. Carbon Filters of the Makeup Water Treatment Plant.
- f. Unit 1/Unit 2 Aux Steam Cross-Connect Piping.

6.3.2 BLEED STEAM SYSTEM

The Bleed Steam System was designed to provide steam from six extraction stages of the high pressure and low pressure turbines to their respective feedwater heaters. This increased the efficiency of the power plant cycle.

In addition, the Bleed Steam System provided heating steam to the first stage reheaters of the moisture separator-reheaters in the Main and Reheat Steam System and supplied steam to the Auxiliary Steam System.

6.3.3 LONG-TERM/OTSG "B" COOLING SYSTEM

The long term OTSG "B" cooling system was designed and installed during the TMI-2 cleanup period and provided the following functions:

- Provided a means to remove decay heat and the heat from one Reactor Coolant Pump from the primary coolant by recirculating water through the "B" Steam Generator using a new decay heat removal heat exchanger and pump.
- Prevented contamination of the ultimate heat sink (river water) by using a closed cooling water system to cool the "B" Steam Generator.

- e. Nitrous Oxide System
- f. Propane System

Acetylene and nitrous oxide lines were provided to support the operation of an atomic absorption spectrophotometer. P-10 count gas was distributed to support the calibration of radiological instruments. Other gases routed by the system included nitrogen, methane, and propane for various laboratory uses. Vacuum lines were also provided for testing of various components.

The basic components of the laboratory gas system included a gas cylinder storage area (located along the north outside wall of the building djacent to the Borated Water Storage Tank) and tubing runs from the cylinder storage area into the Service Building.

The system was not designed to seismic criteria. Design pressures and temperatures for the system were based upon the maximum cylinder pressures of the various gas cylinders to be provided. These pressures ranged from 2640 psig (for nitrogen) to 110 psig (for propane). In as much as pressurized gas cylinders provided the motive force for gas transport in the system, there were no pumps associated with the system except for VL-P-1 and VL-P-2, which were the vacuum pumps for each of the two available vacuum connections. The only other major pieces of equipment associated with the system were a line heater (NO-H-1) for the nitrous oxide supply and a flash arrester (AL-V3) for the acetylene supply system.

All storage bottles have been removed for PDMS.

6.3.30 MAKEUP WATER TREATMENT AND CONDENSATE POLISHING SYSTEM

The Makeup Water Treatment System processed Susquehanna River water and provided high purity filtered and demineralized water for the Demineralized Service Water System. In addition, this system supplied the condensate polishing system which reduced the level of suspended and dissolved impurities in the feedwater and condensate system to acceptable levels.

6.3.31 AMMONIA SYSTEM

The Ammonia System was used in the condensate polishing system to reduce the level of suspended and dissolved impurities in the Feedwater and Condensate System to acceptable levels, thereby eliminating impurities that could cause corrosion of steam generator tubes. The ammonium hydroxide and hydrazine feed to the Condensate and Feedwater Systems were used for maintaining feedwater pH and scavenging oxygen, respectively.

TABLE 6.3-1 (cont'd)

DEACTIVATED SYSTEMS

SYSTEM DESCRIPTION Propane Lab	SYSTEM CODE PL	PDMS FUNCTION NONE	CONTAINMENT ISOLATION NO	INTERNAL CONTAMINATION N/A	REMARKS All bottles removed from plant and all lines depressurized.
Water Treatment	WT	NONE	NO	NO	
Ammonia	AM	NONE	NO	NO	All ammonia removed from plant.
Reactor Building Chiller Water	RBC	NONE	NO	NO	
Safety Features Actuation	ES	NONE	NO	N/A	This system is the instrumentation monitoring and trip initiating system for the Engineered Safety Features System.
Breathing Air	BA	NONE	NO	NO	This system is a manifold attached to the "SA" system.
Containment Air Control Envelope HVAC	СН	NONE	NO	NO	
Control Rod Drive	CRD	NONE	NO	NO	
Miscellaneous Instrumentation	YM	NONE	NO	N/A	
Cond. Air Extraction Filter	CAE	NONE	NO	NO	This system is a post accident addition to the "VA" system.

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Which, in turn, leads to the determination that the equivalent value of (ℓ/d^4) for the leak paths is:

$$(\ell/d^4)_{loak} = 2.61E10 \text{ ft}^{-3}$$

[If the length of the leak path is on the order of the Containment wall thickness (i.e., 4 ft), the total leak diameter would be 0.042 inches.]

The ratio of leak flow to Breather vent flow can then be written as:

$$\dot{m}_{1} / \dot{m}_{v} = \frac{1}{(128\mu/\pi g_{c})(\ell/d^{4})_{vent} + K} / [(128\mu/\pi g_{c})(\ell/d^{4})_{leak}]}$$
 (7)

with:

$$(\ell/d^4)_{vent} = 480 \text{ ft}^{-3}$$

$$K = 0.312 \text{ lbf-sec/ft}^5$$

This gives the ratio of mass flow rates as:

$$(m_1 / m_v) = (0.00717 + 0.312) / 3.89E5 = .000001$$

Therefore, the Containment Atmospheric Breather clearly is "the most probable pathway".

As stated in Section 7.2.1.2.2, there is a welded plate installed downstream of the HEPA filter that holds four sample filter paper frames; each frame holds a set of two filter papers. The air flow into and out of the containment via the Breather also passes through each set of two sample filters. (For the purposes of this discussion, the sample filter papers closest to the Breather HEPA will be referred to as the No. 1 Filters and the sample filter papers farthest from the Breather HEPA and closest to the Auxiliary Building atmosphere as the No. 2 Filters.) The Breather HEPA filters the air leaving the Containment into the Auxiliary Building. Filter No. 1 collects the material that may pass through the HEPA filter. Filter No. 2 filters and samples the air coming back into the Containment from the Auxiliary Building.

All four of the No. 1 Filters are removed semi-annually and one is assayed for radioactivity. If any activity is found on the filter, it will be assumed that, for the sampling time period, a like amount of activity was released from the Containment into the Auxiliary Building (i.e., an assumed efficiency of 50%). This is a very conservative approach since the sample filter papers used have a collection efficiency of greater than 90%. Using this methodology, any activity assumed to be released is captured on the filter and will be assumed to have been released over the six month time period. Since the filter deposition is cumulative, this method provides determinative (but not real time) monitoring to verify that effluents through the Breather are within the calculated values in Chapter 8. Due to the extremely low releases calculated for PDMS, the sample filter paper is deemed adequate for determining the releases anticipated

Single line diagrams of the Unit 2 AC distribution system are shown on Figures 7.2-14 through 7.2-42 and contain the following details:

- a. Power supply feeders (i.e., network configuration)
- b. Busing arrangements
- c. Loads supplied from each bus
- Manual and automatic interconnections between buses, buses and loads, and buses and supplies
- e. Equipment capacities
- f. Instrumentation and control systems for the applicable power systems with the assigned power supply identified
- g. Electric circuit protection system network.

7.2.5.1.3 Evaluation

The Auxiliary Electrical Distribution System has been modified to meet the requirements of PDMS. Due to the deactivation of the reactor and its associated support systems, Class 1E emergency diesel backed power systems are no longer required. In support of this, the emergency diesel generators have been deactivated and the Engineered Safety Feature buses no longer have connection capability to the emergency diesel generator buses 2DG-1 and 2DG-2. The Engineered Safety Feature buses will no longer be considered Class 1E. All non-PDMS support systems and components have been deactivated and isolated from the power distribution system. Administrative controls have been developed and are in place to govern the use of PDMS support systems and prevent unauthorized use of deactivated systems. Load consolidation has been performed in order to reduce the number of energized circuits which reduces plant maintenance and surveillance activities thereby enhancing overall plant safety. DC power required during PDMS is supplied through a battery charger. Backup power has been provided to support a significant portion of the fire protection system during a temporary loss of power.

The Auxiliary Electrical Distribution System, as modified for PDMS, will provide sufficient reliable electrical power to support all PDMS activities with enhanced overall plant and personnel safety. In the event that all electrical power is lost, all ventilation and water processing will be suspended and actions will be taken expeditiously to restore power. In the unlikely event that power cannot be restored within 14 days, a report will be submitted to the NRC within 30 days detailing the plans and schedule to restore power.

operational to transfer accumulated water to minimize potential spread of contamination due to localized flooding.

7.2.6.6 Sewers

7.2.6.6.1 PDMS Function

The basic function of the sewage collection system is to transport sewage from TMI-2 structures to the Sewage Treatment Plant. The PDMS configuration is shown on Figure 7.2-47.

7.2.6.6.2 System Description

Sewage from the temporary personnel access facility (TPAF) in the Turbine Building and several outbuildings is routed to the Sewage Treatment Plant which serves both TMI-1 and TMI-2. The major operational portion of the Sewer System is underground gravity flow piping that provides for the transport of sewage from the Unit 2 support facilities to the STP.

7.2.6.6.3 Evaluation

The Sewage Treatment Plant will process sewage from the TPAF and several outbuildings. The majority of TMI-2 sewage piping is underground below the frost line.

7.2.6.7 Domestic Water System

7.2.6.7.1 PDMS Function

During PDMS, portions of the existing domestic water system will remain operational to provide domestic water services required during PDMS.

7.2.6.7.2 System Description

The domestic water system is maintained as a modified operational system. Unit 2 is supplied with domestic water from Unit 1 which is then distributed to Unit 2 support facilities. Domestic water is provided to the radwaste seal water unit in the Auxiliary Building, to the TPAF in the Turbine Building, and to several outbuildings. The PDMS configuration is shown on Figures 7.2-47 and 7.2-48.

7.2.6.7.3 Evaluation

Since personnel access into the plant will be infrequent, only one source of domestic water is required in the Turbine Building. The Auxiliary Building header is isolated but, if necessary, can be repressurized to supply domestic water to the seal water unit by opening one valve. Unit 1 and Unit 2 support facilities will remain operational; therefore, domestic water will continue to be supplied to them.

7.2.6.8 Control Room Ventilation System

7.2.6.8.1 PDMS Function

The Control Room Ventilation System will be maintained in an operational condition to support PDMS activities. This system provides fresh, filtered, heated or cooled air in sufficient quantity to support personnel occupancy.

7.2.6.8.2 System Description

The Control Room Ventilation System is a forced flow heating and ventilation system consisting of a supply and exhaust subsystem which provides once-through ventilation with partial recirculation.

When the ventilation system is not operating, it provides a passive, filtered pathway for equalization to atmospheric pressure. The PDMS configuration is shown on Figure 7.2-49.

7.2.6.8.3 Evaluation

During PDMS, Control Room ventilation and air handling equipment provide a filtered pathway for active and passive operation to meet industrial and radiological requirements. The Control Room Ventilation System is maintained operational for the occasional maintenance and surveillance entries into the TMI-2 Control Room and in response to off-normal conditions.

7.2.6.9 Cable Room Ventilation System

7.2.6.9.1 PDMS Function

The Cable Room Ventilation System will be maintained in an operational condition to support PDMS activities. When in operation, this system provides fresh, filtered, heated or cooled air in sufficient quantity to maintain room temperatures suitable for personnel and equipment.

7.2.6.9.2 System Description

The Cable Room Ventilation System is a forced flow heating and ventilation system consisting of a supply and exhaust-return subsystem which provides ventilation with partial recirculation.

When the ventilation system is not operating, a damper in the bypass duct will open, allowing free passage of air in the exhaust-return duct system. The PDMS configuration is shown on Figure 7.2-49.

REFERENCES

7.2-1 GPU Nuclear letter, LL2-81-0191, "Design Pressure for Containment and Future Mechanical and Electrical Penetration Modifications," dated December 4, 1981.

TABLE 7.2-4
PIRE PROTECTION SOME DETECTION SYSTEMS

			FIRE !	PROTEC	TION ZONE DE	TECTION SYSTEMS		
BUILDING	LOCAL CONTROL PANEL*	ELEVATION	ZONE	ST	DMS ATUS DS	ZONE DETECTORS**	AUXILIARY FUNCTIONS	
Auxiliary Building	711	258'-6" & 280'-6"	2	х		FS-XD-6087, 6088, FS-XD-6089-1, 6089-2 FS-XD-6090-1, 6090-2 FS-XD-6091, 6092 FS-XD-6093-1, 6093-2 FS-XD-6094 through 6097	Stops Fans AH-E-7A & B, AH-E-8A, B, C. D, and AH-E-41	
		305'-0"	3	ж		FS-XD-6098-1, 6098-2 FS-XD-6099-1, through 6099-3 FS-XD-6100-1 through 6100-4 PS-XD-6101, 6102 FS-XD-6103-1 through 6103-8 FS-XD-6104-1, 6104-2 FS-XD-6105		
		328'-0"	4 A 4 B 4 C		X X X			
		328'-0" & 347'-6"	4D	х		PS-XD-6107-1, 6107-2 PS-XD-6108-1, 6108-2 PS-XD-6109-1 through 6105-38		
Chlorinator House	712***	***	5		×			
Circulating Water Pump House	713		6		х			
Coaqulator Building	714		7	X			Stops Pan AH-E-42.	
Control Building	715	280'-6"	88	X		PS-XD-6142-1 through 6142-4 PS-XD-6143-1 through 6143-4	Stops Pans AH-C-17A, B & AH-E-20.	
		Mezzanine	8 C	X		FS-XD-6144-1 through 6144-9		
		280′-6″	8D 38	X		PS-XD-6138-1 through 6138-4 PS-XD-6139-1 through 6139-4		
		351"-6"	8.F		X			
		305'-0" & 351'-6"	9	х		FS-XD-6147-2, 4, 6, 8, 10, 12	Stops Pans AH-C-17A, B, AH-E-20. Shuts Damper D4073.	
	305'-0"	9 A	х		PS-XD-6147-1, 3, 5, 7, 9, 11, 13	Stope Pens AH-C-17A, B, AH-E-20. Shuts Damper D4073.		
			93		8			
		331'-6"	10	×		FS-XD-6148-1 through 5148-16, FS-XD-6154, 6161	Stops Pans AH-C-16 A & B, AH-E-35, AH-E-4A &B, AH-E-5, AH-E-25. Shuts Damper D4092C.	
		351"-6"	11A		X			
			118	X		PS-XD-6155, 6159, 6140 PS-XD-6158-1 through 6158-15	Stops Pans AH-C-19A & B, AH-E-6, and AH-E-40.	
				7.2	-39a		AMENDMENT 20 - DECEMBER	

TABLE 7.2-4 (Cont'd)

FIRE PROTECTION ZONE DETECTION SYSTEMS

BUILDING	LOCAL CONTROL PAREL*	ELEVATION	ZONE	PD STA		ZONE DETECTORS**	AUXILIARY FUNCTIONS
Control Building Area	716	280'-6"	12A 12B	X X		PS-XD-6182-1 through 6182-8 PS-XD-6183-1 through 6183-12	Stops Pans AB-C-50A & B, AH-C-51. Stops Pans AB-E-13, AB-C-58A through J, AH-E-62.
Fire Pump House	718	312'-0"	15		×		
Puel Bandling Building 719	719	280'-6"	16	х		PS-KD-6240-1 through 6240-12, PS-KD-6249	Stops Fans AH-E-9A & B, AH-E-10A, B, C, and D.
		305 '-0 " 328 '-0 "	17 18A 18B	×	X X	PS-ND-6241 through 6241-4	
		347'-6"	19	×		FS-XD-6251-1 through 6251-12	
Mechanical Draft Cooling Tower			20		×		
Reactor Building	720	328'-0"	22A		×		
			22B		К		
			22C		×.		
		305'-0" & 347'-6"	220	×		PS-XD-6275-1 through 5275-5 PS-XD-6276-1 through 9276-5	
		347 * - 6 *	22E	×		FS-XD-6277	Stops Pan AH-E-63.
		282'-6'	227	×		PS-XD-6278	Stops Pans AB-E-12A & B, AB-E-19A & B, AB-E-34. Shuts Valves AB-V-1A & B, AB-V-4A & B.
River Water Pump House	718	280'-9" & 312'-0"	2.3		×		

TABLE 7.2-4 (Cont'd)

PIRE PROTECTION IONE DETECTION SYSTEMS

BUILDING	LOCAL CONTROL PANEL*	ELEVATION	ZONE	ST	DMS ATUS DS	ZONE DETECTORS**	AUXILIARY FUNCTIONS
Service Building	721	280'-6'	24	χ		FS-XD-6342-1 through 6342-5 FS-XD-6343 FS-XD-6344-1 through 6344-4	Stops Fans AH-C-SDA & B, AH-C-51
		305 ^ - 0 *	25	×		FS-XD-6319, 6320 FS-XD-6321-1, 6321-2 FS-XD-6322 through 6337 FS-XD-6338-1, 6338-2 FS-XD-6339-1, 6339-2 FS-XD-6348-1 through 6348-4	Stops Pans AB-E-23A & B, AH-C-24, AB-C-25A & B, AH-E-26, AB-E-27, AB-E-28, AB-E-33 and AB-C-36.
		322'-0" 6 331'-6"	26A 26B	×		FS-XD-6340-1, 6340-2 FS-XD-6341-1 through 6341-5 FS-XD-6315-1, 6315-2 2S-XD-6316-1, 6316-2 FS-XD-6317, 6318	
			26C 26D 26E		X X		
Turbine Building 722	722	281'-6"	27A		X		
			278	х		FS-XD-6364 PS-XD-6373-1 through 6373-25	
		305'-0"	28A 28B 30	x	X	PS-XD-6366-1 through 6366-8 PS-XD-6367-1 through 6367-4 FS-XD-6368-1 through 6368-3 PS-XD-6369-1. 6369-2	
		331'-6"	2.9	X		FS-KD-6365, 6370, 6371 FS-XD-6372-1 through 6372-16	Stops Fans AH-E-1 & Z. AR-E-38.

^{*}Power Supply for all Zone Detection Panels is from Vital Power Panel 2-4V through Fire Protection Fuse Panel 4.
**Only operational area ionization smoke detectors are listed; all duct smoke detectors have been deactivated.
***Control Panel 712 receives operational signals from WHPF and Respirator Facility for transmission to TMI-1 Control Room.

- 9. Section 7.2.4.3 Effluent Monitoring indicates that "Areas and systems within the AFHB containing contamination sufficient to pose a potential for a release will be sealed". In the previous question we asked about the <u>cubicles</u> that will be sealed. Provide the following information for those <u>areas</u> and <u>systems</u> not discussed in your answer to our previous question:
 - 1. What additional areas and systems will be sealed,
 - 2. The delines used to determine if an area should be sealed.
 - 3. ted level of contamination in each of the areas or systems that will be sealed, axed and removable),
 - 4. Where each area and system will be sealed and the method that will be used for sealing to ensure ' 'there will be no release of contamination.

RESPONSE:

- Besides the "A" spent fuel pool, discussed in response to the previous question, no other area has been identified which required sealing, since there are no areas that contain sufficient loose contamination to pose a contamination spreading concern. Piping systems which were found to be internally contaminated upon draining were sealed by closed and drain valves or valves which form a boundary with interfacing sy Unisolable vent paths (e.g., the steam exhaust stack from the turbine driven entired water pump) were sealed by capping, plugging, etc.
- An area would have been a candidate for sealing if surface contamination levels and area air flow characteristics had created a contamination spreading concern.
- No area (besides the "A" spent fuel pool) required sealing. Piping systems were sealed when sample results indicated levels of contamination greater than LLD.
- 4. Since, no areas (besides the "A" spent fuel pool) required sealing, the method of sealing cannot be provided. Systems were sealed by closing vent and drain valves and valves which form a boundary with interfacing systems.

- 12. Section 6.17 Mechanical Draft Cooling Tower. "Fire Protection for the wood portion of cooling towers will remain operational to mitigate consequences of a fire."
- 13. What type of fire protection system is in place? What methods are used to avoid pipe damage as a result of freezing temperatures?

RESPONSE: (The correct reference is to Section 6.1.7.)

The Mechanical Draft Cooling Tower has been dismantled; the combustible material from the two (2) Natural Draft Cooling Towers has been removed. PDMS SAR Sections 6.1.6 and 6.1.7 have been revised accordingly.

16. Section 7.1.6 - Unit 1/Unit 2 Corridor - The waste shredder, packaging, and other similar items constitute a possible combustible loading that should be addressed for PDMS. Are there fire barriers in place and/or extinguishing systems that protect the area? Are combustibles stored in a manner that reduces fire potential, such as minimal amounts in closed metal cabinets?

RESPONSE:

This entire process (i.e., waste shredder, packaging, and other similar items) has been removed. Section 7.1.6 of the PDMS SAR has been changed to reflect this.

17. Section 7.2.2 - Fire Protection Service and Suppression - This section discussed "potential" fires and "credible" fires, however, only three cases are given in Section 8.2.5. Identify credible fires, by addressing combustible loading in the facility. Discuss the effects of such fires on PDMS-related systems (for example HVAC).

RESPONSE:

For PDMS, there are four separate fire zones in the Reactor Building: 1. the combined 305' and 347' elevations; 2. the combined "A" and "B" Drings; 3. the Fuel Transfer Canal (FTC); and 4. the basement. A fire could potentially occur in any one of these zones, but should be contained within that one zone due to construction configuration and remaining combustibles. As discussed in PDMS SAR Section 8.2.5, the worst-case fire with regard to off-site dose consequences is a postulated fire in the RB Basement. This postulated event bounds any credible fire accident in the Reactor, Auxiliary, and Fuel Handling Buildings for PDMS. Combustible loading in containment and adjacent areas is outlined in the TMI-2 Fire Protection Program Evaluation (FPPE), which is the TMI-2 fire hazards analysis. The TMI-2 FPPE for PDMS was submitted to the NRC via GPU Nuclear letter C312-93-2064, dated October 14, 1993. The FPPE incorporates the four fire zones concept discussed above. For the remainder of the plant, the fire loadings were discussed in a previous revision of the fire hazards analysis (submitted November 2, 1984). Those fire loadings have not changed significantly and are typically low (less than 1 hour loading of 80,000 BTU/ft² and in most cases less than a 1/2 hour loading of 40,000 BTU/ft²). The combustibles consist of typical power plant materials, which are primarily electrical cable designed to IEEE-383. With the plant in PDMS, most electrical systems are de-energized, thus removing the principal ignition source. Therefore, many of the postulated fires in the FPPE are not considered credible; PDMS SAR Section 8.2.5 discusses the worst-case postulated fire with three (3) ventilation scenarios.

The effects of fire on systems used in PDMS is either insignificant or addressed in PDMS SAR Section 8.2.5. Interlocks with ventilation are listed in Table 7.2-4 of the PDMS SAR.

18. Section 7.2.2.1 - PDMS Function - Paragraph (b) indicates that "automatic fire suppression shall be provided to areas of the facility and systems which contain significant amounts of combustibles and possible ignition sources." Define "significant quantities" (for instance as BTU/sq ft in any one area). List the areas that you anticipate will contain these quantities.

RESPONSE:

The original paragraph (b) of section 7.2.2.1 has been deleted since no areas contain significant quantities of combustibles and possible ignition sources.

For TMI-2, 80,000 BTU/ft² is the value used for "significant quantities" of combustibles. No area of the TMI-2 plant contains this quantity of combustibles.

19. Section 7.2.2.1 - PDMS Function - Paragraph (e) states that the "presence of flammable and/or combustible liquids and materials shall be minimized to the maximum extent practical." How will the minimization of flammable liquids and combustibles be carried out and enforced. What procedures will be used to control these items? Will periodic fire inspections be conducted?

RESPONSE:

PDMS SAR Section 7.2.2.2 items f, g, and h defined the actions accomplished to reduce combustible material inventories in the plant, which were to remove most non-original plant items installed post-accident, remove most lube oil and fuel oil from tanks and reservoirs, and remove charcoal filters.

A Fire Protection Program similar to that which was in place during Facility Mode 3 will maintain these reductions and control the introduction of other materials. This Fire Protection Program also addresses plant fire protection and housekeeping inspections. The frequency of these inspections will be at least quarterly.

26. Section 7.2.2.2 - System Description - Paragraph (m) - How was it determined that the fire hazard risk in certain areas was small? Was a fire hazard analysis conducted? If so, provide a copy of the analysis.

RESPONSE:

Fire loadings less than 40,000 BTU/ft² arc considered small. The basis for this consideration is that the plant is in a stored condition with transient combustibles removed and most electrical systems de-energized.

The TMI-2 FPPE for PDMS was submitted to the NRC via GPU Nuclear letter C312-93-2064, dated October 14, 1993. See response to Question No. 17.

27. Section 7.2.2.3 - Evaluation - Is documentation available to show that combustibles have been removed (or procedures to indicate that combustibles will be removed) from areas in which the scope of fire protection has been reduced?

RESPONSE:

PDMS SAR Section 7.2.2.2 discusses some of the removals. An internal Unit Work Instruction (UWI) tracks the removal of these materials. Essentially, as much as possible was removed from the plant with limitations based on cost of removal vs. fire risk and continued need for the post-accident component or supply. There is no intention to remove original plant or structural items other than significant hazards, such as fuel and lube oils (to the extent practical under ALARA considerations) and hydrogen gas.

28. Paragraph 3 - Will periodic function testing and maintenance occur to determine that each device is operational? If so, describe the testing program.

RESPONSE:

The testing and maintenance program currently in place will continue on subsystems and components required to be operational for PDMS. Any deletions or reductions in scope (e.g., NFPA compliance) or frequency will be evaluated under the provisions of 10 CFR 50.59. Specific testing requirements are addressed in PDMS operating procedures.

33. Section 8.2.5 - Fire Inside Containment - This section postulates a fire from oil in the reactor coolant pumps, yet paragraph 6.3.51 states that the oil has been removed from the pumps. In addition, Section 7.2.2.2, paragraph (e) does not mention the removal of the oil from the reactor coolant pumps. Will the oil be present in the reactor coolant pumps during PDMS. How much will be present?

RESPONSE:

The entire reactor coolant pump lube oil inventory was not removed since the dose rates severely limit access to the areas of the pumps and oil collection/drain systems. PDMS SAR Section 6.3.51 has been revised to reflect this. Each of the four reactor coolant pumps has two sumps containing 120 gallons of oil in the upper reservoir and 18 gallons in the lower for a total of 138 gallons of oil per pump. More than 40% of this oil has been removed.

- A.1. What system has been established to verify continued maintenance of isolation of the areas and components that assure subcriticality?
- RESPONSE: The current TMI-2 Technical Specifications state that Facility Mode 2 "shall exist when the following conditions are met:
 - a. The Reactor Vessel and Reactor Coolant System are defueled to the extent reasonably achievable.
 - b. The possibility of criticality in the Reactor Building is precluded.
 - c. There are no canisters containing core material in the Reactor Building."

Demonstration that these conditions have been met was contained in the TMI-2 Defueling Completion Report (DCR) which justified the transition from Facility Mode 1 to Facility Mode 2 and in GPU Nuclear letter C312-92-2080, dated December 18, 1992, which evaluated RV subcriticality based on an increased RV fuel estimate. The DCR stated that no inspections or monitoring are necessary during PDMS to ensure subcriticality. This conclusion is not altered by the evaluation contained in the referenced GPU Nuclear letter. Therefore, the subject of criticality has been resolved and is not an issue for TMI-2 in PDMS.

Subcriticality at TMI-2 during monitored storage is assured by at least two independent means in all fuel locations. Outside of the Reactor Vessel, there is far less than a critical mass in any single location. In addition, transport of material from one location to another is precluded by the drained state of the Reactor Coolant System. Finally, closed containment isolation valves prevent transport of fissile material between the Reactor Building and the Auxiliary and Fuel Handling Buildings.

In the Reactor Vessel, subcriticality is ensured as described in the TMI-2 DCR and the above mentioned GPU Nuclear letter. Once again, transport of fissile material to or from the Reactor Vessel is inhibited by the drained state of the Reactor Coolant System.

A.2. Is the Reactor Vessel to be sealed prior to PDMS? If the indexing fixture and shielded work platform are to remain in place, what is the expected dose rate from radiation (both direct and scattered) on the 305 ft. and 347 ft. levels?

RESPONSE:

The Reactor Vessel is covered but not sealed. The cover controls the spread of contamination and prohibits water ingress but permits hydrogen egress via a vent.

The exposure rate on the 305 ft. and 347 ft. elevations average 150 mR/hr and 50 mR/hr, respectively. The exposure rate is overwhelmingly governed by Cobalt-60 activation of the baffle plates. Dose rate contributions from residual fuel and Cesium-137 surface contamination are negligible. Shine and backscatter are also negligible since the distance between the radiation source and the nearest solid object (i.e., the polar crane) is over 100 ft.

A.4. Will emergency lighting be maintained in the Service and Turbine Buildings during PDMS?

RESPONSE:

Installed emergency lighting will be maintained during PDMS. Normal lighting is available throughout TMI-2 except in the RB. Normal lighting within the RB is provided by strings of lights installed on the 305' and 347' elevations. The lighting is adequate to support PDMS inspection and test activities without additional illumination from the installed building lighting. Eight hour portable emergency lighting will be carried by emergency personnel crews entering the buildings. This lighting will be staged with emergency response crew equipment. Routine entry crews will carry flashlights.

PDMS SAR Section 7.2.5.2 has been revised accordingly.

A.5. Has a decision been made as to dismantling the redwood cooling tower?

The Mechanical Draft Cooling Tower has been dismantled; the combustible RESPONSE: material from the two Natural Draft Cooling Towers was removed. PDMS

SAR Sections 6.1.6 and 6.1.7 have been revised accordingly.

B.4. Provide additional detailed information on methodology for the determination of release rates and effluent concentrations for containment and AFHB gaseous effluents during passive mode conditions.

RESPONSE:

As discussed in PDMS SAR Section 7.2.1.2, the Containment Atmospheric Breather was added to the Containment to provide passive pressure control of the Containment relative to ambient atmospheric pressure and to establish a "most probable pathway" through which the Containment will "breathe." Refer to Supplement 3, Question B.3 for a discussion of the methodology for determining gaseous effluent releases for reporting purposes.

In the Auxiliary and Fuel Handling Buildings (AFHB), no airborne effluent discharges are anticipated. Areas and systems within the AFHB containing contamination sufficient to pose a potential for a release will be sealed; refer to Supplement 1, Question 8 for further information.

B.7. Provide flowpath, methodology for inplace DOP testing, and clarification of size and location of HEPA filter in atmospheric breather for containment.

RESPONSE:

Refer to PDMS SAR Figure 7.2-2. The Hydrogen Control Exhaust Unit is used as the Reactor Building passive breather. Filter position AH-F-33 contains a 24" x 24" x 11 1/2" HEPA and a welded plate installed downstream of the HEPA that holds four sample filter paper frames. Each frame holds a set of two sample filter papers. All other filter positions are empty.

The Reactor Building passive breather is operated in the following modes:

- Passive Breathing AH-V-3A, AH-V-52, AH-V-153, AH-V-154, and AH-V-25 will be open and AH-V-4A, AH-V-120A, and AH-V-36 will be closed. A filter housing door downstream of AH-F-33 will be opened. In this configuration, the Reactor Building naturally aspirates via a HEPA-filtered pathway to the Auxiliary Building which, in turn, either naturally aspirates or is ventilated to the environment through yet another set of HEPA filters.
- DOP Testing AH-V-3A, AH-V-25, and AH-V-36 will be open. AH-V-52, AH-V-4A, AH-V-120A, and the filter housing door, which would be open during passive breathing, will be closed. As the Hydrogen Control Exhaust Fan, AH-E-34, or a portable blower is operated, DOP is injected upstream of AH-F-33 and sampled downstream using ports. DOP testing of the HEPA filter will be performed without the sample filter paper frames in place.

Provide estimates of the total activity remaining in the Auxiliary Building, the Fuel Handling Building, and in each of the seven (7) other contaminated facilities at TMI-2.

RESPONSE:

The estimated total activity present as loose surface contamination in the AFHB and the seven (7) other contaminated facilities at TMI-2 upon entry into PDMS is given in PDMS SAR Tables 5.3-5 and 5.3-6. The total quantity of contamination (fixed and loose) in the AFHB and the seven other contaminated facilities at TMI-2 is approximately 12,000 Ci as given in GPU Nuclear letter C312-93-2076, dated December 13, 1993.

B.11. Describe the air flow pathways between the Auxiliary Building and the Fuel Handling Building during PDMS.

RESPONSE: Refer to PDMS SAR Figures 1.2-8, 9, 10, and 11.

The TMI-2 Fuel Handling Building is a four floor building which shares a common wall with the TMI-2 Auxiliary Building. On all levels, there are personnel doors which allow passage through the common wall. When the AFHB ventilation is secured, the doors on the first three floors between the TMI-2 Fuel Handling Building and the TMI-2 Auxiliary Building (i.e., El. 280', 305', and 328') will remain open to allow free air passage between the buildings.

The TMI-2 Fuel Handling Building also shares a common roof and west wall with the TMI-1 Fuel Handling Building. The building space above the 347' elevation is common to TMI-1 and TMI-2 as is the Truck Bay (El. 305') and the Standby Pressure Control (SPC) pit (El. 328'). However, the doors from the TMI-2 side which access the Fuel Handling Building volume common to both TMI-1 and TMI-2 are closed, limiting the supply of air from the TMI-2 side. Dampers are shut; wall and floor penetrations are sealed. The Fuel Handling Building volume common to both TMI-1 and TMI-2 is maintained at a slightly negative pressure by the TMI-1 Fuel Handling Building ventilation system. Air flow from the TMI-2 side is expected to be negligible due to the lack of supply air.

A.11. What is meant in the same report as to "exceptions to Phase III endpoint criteria"?

RESPONSE:

As stated in PDMS SAR Section 5.3.1, a final PDMS radiological assessment was performed utilizing radiological surveys as a basis for determining whether the established Phase III endpoints were achieved. At the conclusion of the radiological assessment, if it was determined that satisfactory radiological conditions were not achieved, either additional decontamination efforts were undertaken or exceptions to the goals were taken. An exception to an established radiological goal was approved based on the nature of the source of the higher dose rate (e.g., is the source highly mobile or tightly adhered), the decontamination methods already used and those available, and/or ALARA considerations.

A.12. Has a determination been made as to the cubicles in the AFHB that will be locked during PDMS?

RESPONSE: Internal cubicles that have doors may or may not be locked at the discretion of management. Cubicles that are not isolated by means of a locked door shall be "roped-off" and labeled with a sign that reads, "CONTROLLED ACCESS AREA IN PDMS LAYUP."

A.15. Evaluate the possibility (and the result) of installing a low volume fan on the passive breather line from the reactor containment building for some period of time upon entry into PDMS to accumulate a data base for release estimates.

RESPONSE:

Since the Reactor Building is "breathing" due to daily temperature and pressure changes, a low volume fan would do very little to maintain a continuous flow. Provisions for determining release estimates has been addressed in PDMS SAR Section 7.2.1.2.3. Two additional sample filter paper frames have been installed downstream from the HEPA filter on the Containment Atmospheric Breather line. Each frame contains a set of four filter papers. The first filter paper set downstream of the HEPA collects radioactive content passing through the HEPA filter; one of the papers is assayed for radioactivity semi-annually. The second filter paper set downstream from the HEPA protects the first filter paper set from any extraneous radioactivity entering from the Auxiliary Building. Since the filter deposition is cumulative, this method provides determinative (not real time) monitoring to verify that effluents through the breather are within the calculated values. Due to the extremely low releases calculated for PDMS, the sample filter papers are adequate for determining the releases anticipated during PDMS.

A.18. Evaluate use of TLDs, remote video equipment or other methods to monitor potential fuel movement in the reactor vessel.

RESPONSE:

Most standard radiation measuring sensors have a significant disadvantage measuring small quantities of fuel in a high radiation field. TLDs tend to lack sensitivity. Cameras will deteriorate rapidly in a high radiation field. All measuring techniques would require radiation exposure to workers due to the Reactor Vessel being drained. Since the RV is drained, there is a very low probability of any driving force significant enough to move any residual fuel. Since the results of our extremely conservative criticality analysis conclude that the small quantity of fuel remaining in the RV does not pose a criticality safety concern (i.e., criticality is precluded) and it is extremely difficult to measure small changes in radiation due to residual fuel relocation, GPU Nuclear intends to minimize radiation exposure to workers by not performing measurements to monitor potential fuel movement.

- B.3. Revision 6, page 7.2-2, and 7.2-6 of the PDMS SAR describes two sample filter papers downstream of the HEPA on the containment atmospheric breather. It also states that "provisions have been made to allow semi-annual sample filter paper removal and assay and reinstallation or replacement of the DOP-tested HEPA."
 - Describe the purpose and the specific installation configuration of the sample filter papers and explain how GPU will assure that analysis of the sample filter paper is indicative of radionuclide releases from the containment breather.
 - Explain why the HEPA is to be reinstalled or replaced, how often is it to be reinstalled or replaced, and for what purpose.

RESPONSE:

Since the containment preferentially "breathes" via the HEPA and sample filter papers to the Auxiliary Building (AB), air flow continuously reverses direction during PDMS due to ambient atmospheric pressure changes. The two filter-in-series design ensures that most of the contamination coming from the AB is trapped by the second paper filter downstream of the HEPA while the first paper filter is analyzed for radionuclide effluents from the Containment. As stated in PDMS SAR Section 7.2.1.2, extremely low releases are anticipated during PDMS. Although the efficiency of the sample filter papers will most likely be much greater than 50%, GPU Nuclear will report the results of the first paper filter assay as though a like quantity of radionuclides was released (i.e., an assumed efficiency of 50%).

The installation configuration of the sample filter papers is a welded plate that holds four filter frames; each frame holds a set of two filter papers that can be removed by loosening four wing nuts and sliding out the frame. The filter paper set is then removed from the frame and analyzed for radionuclide content. DOP testing of the HEPA filter will be performed without the sample filter paper frames in place. Based on the test results, the HEPA may have to be reinstalled or replaced to ensure that it is filtering effluents as designed. A frequency of reinstallation or replacement will be solely dependent on the results of the DOP testing performed to ensure HEPA integrity.

1. Provide an estimate of the total quantity of contamination (in curies) in the Auxiliary and Fuel Handling Buildings. Include both fixed and removable contamination.

RESPONSE: See the response to PDMS SAR Supplement 2, Question B.8.

Will sumps and floor drains in the AFHB be capped or sealed during PDMS? If some will not, identify which ones which will not be capped or sealed and indicate the methods to be used to ensure that activity within floor drain piping and sumps does not move outside as they dry. If no methods are to be used, provide an estimate of the number of curies located in the floor drains or sumps.

RESPONSE:

Sumps that remain in service were not sealed. Sumps that were removed from service may have been sealed if radiological monitoring indicated that significant activity is migrating from the sump.

Floor drains remain open and unaltered where possible. A number of floor drains in the AFHB have been altered because they have become a source of contamination in their respective cubicles. The activity is believed to move along the drain lines as a result of two mechanisms: 1) the different air pressures in the cubicles causes the floor drain piping to be an air flowpath between the cubicles; and 2) the water loop seals in some of the drains evaporates allowing air flow. As a result of this potential problem, ball float valves have been installed in some of the drains. These ball floats allow water to drain from the drains. When no water is present, the ball floats lower and block airflow from the drain which also decreases the rate at which water evaporates from the loop seal. In addition to installing ball float valves, a few floor drains have been plugged.

Regarding a curie estimate, there are approximately 17 Ci of contamination in the floor drains and approximately 600 Ci in the sumps with over 99% contained in the Auxiliary Building sump.

 The new technical specifications proposes deleting the definition of ACCIDENT GENERATED WATER. The staff suggests retaining the definition until the conclusion of the AGW disposal activity.

RESPONSE: AGW evaporation was completed on August 12, 1993. Therefore, this PDMS Technical Specification definition was deleted.

9. Section 3.3.3.1 of the current Technical Specifications requires specific radiation monitors to be operable. The licensee proposes deleting all listed radiation monitors. The staff recommends that the licensee retain radiation monitors in the waste handling and packaging facility (operable during radioactive waste handling or processing activities), the EPICOR Monitor until AGW processing is complete (the staff would agree to maintain monitor operational only when there is a potential for a release in the EPICOR Building, i.e., during radioactive waste handling or processing), and HP-219 and HP-219A. The staff will also accept inclusion of these monitors in the Offsite Dose Calculation Manual (ODCM) consistent with Generic Letter 89-01 dated January 31, 1989.

RESPONSE: All radiation monitors were transferred to the ODCM in accordance with Generic Letter 89-01. Therefore, PDMS Tech. Spec. Section 3.3.3.1 has been deleted.

15. Section 3.2.1.2, Gaseous Effluents, of the proposed specification should include in Table 4.2-2, the requirement that if the reactor building purge grab sample exceeds some level of MPC (staff suggests 25%), then the licensee would perform alpha and Sr-90 analyses on the sample.

RESPONSE: This section was transferred into the ODCM in accordance with Generic Letter 89-01. Therefore, PDMS Tech. Spec. Section 3.2.1.2 has been deleted.

16. The staff recommends that the proposed Liquid Effluent section of Section 3/4.2.1, Radioactive Discharges, be revised to state that if TMI-2 begins to release liquid discharges from the facility after conclusion of AGW evaporation that batch discharges be recirculated the equivalent of three volumes and sampled and analyzed prior to discharge. Additionally, a grab sample shall be taken during discharge or a monitor with alarm and recorder be placed on the discharge line downstream of the batch tank.

RESPONSE: This section was transferred into the ODCM in accordance with Generic Letter 89-01. Therefore, PDMS Tech. Spec. Section 3/4.2.1 has been deleted. However, PDMS SAR Section 7.2.3.2.1 has been revised to include a discussion of the radiation detector in the liquid discharge line.

17. Section 3.7.6, Flood Protection, in the existing Technical Specifications describes measures that should be taken by the licensee when the river exceeds 301 feet MSL at the Unit 1 river water intake structure. The licensee proposes deleting this requirement. The staff recommends that this requirement be retained.

RESPONSE: The requirements for flood protection are contained in the SAR text in accordance with the NRC Policy Statement on Tech. Spec. simplification. The Recovery Tech. Spec. requirements on flood protection were prescriptive and, as such, are better placed in a procedure rather than in Tech. Specs. To this end, GPU Nuclear has merged the Unit 1 and Unit 2 flood protection requirements into a site procedure. The contents of this procedure comply with the requirements for flood protection contained in the PDMS SAR.