

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

Technical Specification Change Request No. 33

The licensee requests that the attached pages 3.7-1, 3.8-4, B3/4 4-1, B 3/4 7-1, be substituted for the existing Technical Specifications.

Reason for Change

The Long Term "B" steam generator cooling system (LTB) is presently considered one of the backup modes for removing decay heat from the reactor coolant system. However, with the successful demonstration of the "loss to ambient" cooling method as the primary mode for removing decay heat, and the availability of the Mini Decay Heat Removal System (MDH) as the backup mode, it is our opinion that LTB is no longer necessary.

Additionally, with the removal of LTB the secondary services closed cooling water system would no longer be needed to supply cooling water for LTB and electrical busses 2-31 and 2-41 would no longer be needed to supply AC power. Thus, the requirements for these systems/components can also be deleted from the Technical Specifications.

Safety Evaluation Justifying Change

Reactor cooling has been maintained by "loss to ambient" cooling since January 1981. Since that time the decay heat generated by the core has decreased from approximately 95 KW to 50 KW and will continue to do so. Thus, "loss to ambient" cooling has proven itself as an effective means of decay heat removal, and there is reasonable assurance that "loss to ambient" cooling will continue to be an effective means of reactor cooling. Additionally, LTB requires natural circulation as the prime mover of primary coolant and was originally designed for the higher temperatures associated with the thermal driving head of  $41.35 \times 10^6$  BTU/Hr. (approximately  $12 \times 10^6$  KW). Thus, LTB is not currently the optimum method of decay heat removal as the presently existing differential temperatures may not provide sufficient driving head for LTB to act as an effective means of core cooling. As the original system design was in response to the much higher levels of decay heat being generated shortly following the March 28, 1979 accident, the need to maintain LTB as a backup means of decay heat removal, in addition to the Mini Decay Heat Removal System, is no longer present. Thus, removal of this system from the Technical Specifications will not increase the probability or consequence of an accident involving the reactor, nor will it reduce the margin of safety.

Amendment Class

The Licensee has determined that because the amendment request involves a single safety concern it represents a Class III License Amendment (per 10CFR 170.22). Therefore, enclosed please find a check in the amount of \$4,000.00.

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