



GPU Nuclear Corporation
Route 441 South
P.O. Box 480
Middletown, Pennsylvania 17057-0480
(717) 944-7621
Writer's Direct Dial Number:
(717) 948-8005

March 11, 1994
C311-94-2024

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 241

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 241.

Also enclosed is a Certificate of Service for this request, certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection.

The purpose of this TSCR is to specify an allowable outage time for the Emergency Feedwater Pumps during surveillance activities. Also, this TSCR changes the requirement to test redundant components for operability to a requirement to ensure operability based on verification of completion of appropriate surveillance activities. Finally, administrative errors made during the processing of Amendments 133 and 174 are corrected.

Sincerely,

T. G. Broughton
Vice President and Director, TMI

AWM/emf

Enclosure: 1) Technical Specifications Change Request No. 241
2) Certificate of Service for Technical Specification Change Request No. 241

cc: Region I Administrator
TMI-1 Senior Project Manager
TMI Section Resident Inspector

18000
9403210171 940311
PDR ADOCK 05000289
PDR

ADD 1/1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
GPU NUCLEAR CORPORATION

DOCKET NO. 50-289
LICENSE NO. DPR-50

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 241 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with executives of Londonderry Township, Dauphin County, Pennsylvania; Dauphin County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Darryl LeHew, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Mr. Russell L. Sheaffer, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Harrisburg, PA 17120

Director, Bureau of Radiation Protection
PA. Department of Environmental Resources
Fifth Floor, Fulton Building
Third and Locust Streets
P. O. Box 2063
Harrisburg, PA 17120
Attn: Mr. Robert Barkanic

GPU NUCLEAR CORPORATION

BY:

J. J. Broughton
Vice President and Director, TMI

DATE:

March 11, 1994

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 241

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications (T.S.):

Replace the existing pages 3-22, 3-25, 3-26b, 3-41, and 3-61 with the attached revised pages 3-22, 3-25, 3-26b, 3-41, and 3-61.

II. REASON FOR CHANGE

This requested change to the T.S. will modify the existing requirements as follows:

- a. T.S. 3.3.1.3.b is modified to correct an administrative error. TSCR No. 222 made no changes to this specification, however, this specification was retyped for this submittal. In the process of retyping, the "+" sign between 8 ft. and 6 inches was inadvertently omitted and not detected during review. Amendment 174 was issued with the + sign omitted.
- b. T.S. 3.3.2 is modified to clarify that maintenance or testing shall be allowed during reactor operation on the components associated with emergency core cooling, reactor building (Rb) emergency cooling, and the RB spray systems.
- c. T.S. 3.4.1.1(2) is modified to provide a specified allowable outage time for the Emergency Feedwater (EFW) pumps during T.S. required surveillance testing.
- d. Bases for T.S. 3.4, last paragraph on page 3-26b, is modified to correct an administrative error. A change was made to this paragraph with Amendment 124 which stated that either both motor driven EFW pumps or the single steam-driven EFW pump are required initially to remove decay heat, with one EFW pump eventually sufficing. When Amendment 133 was issued, this paragraph was inadvertently changed to pre-Amendment 124 wording. In addition, a clarifying sentence was added to explain that acceptably minor operator action may be required during surveillance testing to ensure both motor driven EFW pumps are available.
- e. T.S. 3.6.6 is modified to change the requirement to test a redundant RB isolation valve for OPERABILITY following a determination that the other valve in the line is inoperable. Instead of testing the redundant valve to verify OPERABILITY, the redundant valve is verified to be OPERABLE by ensuring the appropriate T.S. surveillance is current.
- f. T.S. 3.15.1.3 is modified to change the requirement to test the redundant control room air treatment system when the other system is made or found to be inoperable for any reason. Instead of testing the redundant system to verify OPERABILITY, the redundant system is verified to be OPERABLE by ensuring the appropriate T.S. surveillance is current.

These changes, in conjunction with TSCRs 228 and 230, are being made to permit full implementation of the guidance provided to licensees regarding OPERABILITY determinations in Generic Letter 91-18. Guidance from NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," and NUREG-1430, "Standard Technical Specifications for Babcock and Wilcox Plants," was used to develop these changes.

III. SAFETY EVALUATION JUSTIFYING CHANGE

1. Page 3-22

T.S. 3.3.2 currently specifies that maintenance is allowed during reactor operation on any component(s) in the makeup and purification, decay heat, RB emergency cooling water, RB spray, Core Flood Tank (CFT) pressure instrumentation, CFT level instrumentation, BWST level instrumentation, or cooling water systems, which will not remove more than one train of each system from service. T.S. 3.3.2 also requires that only one train can be affected such that it is inoperable no more than 72 consecutive hours.

This proposed change would clarify the intent of this specification to also allow any component(s) to be removed from service for T.S. surveillance testing. Thus, when any component(s) becomes inoperable in the course of T.S. surveillance testing, the same restrictions as those for maintenance apply and there is no change in the safety function capability of the systems with redundant trains.

This proposed change also includes a modification to T.S. 3.3.1.3.b to correct an administrative error. The "+" sign between 8 ft. and 6 inches was inadvertently omitted when submitting TSCR No. 222 and was subsequently missing when the associated Amendment 174 was issued.

2. Page 3-25

T.S. 3.4.1.1 provides the requirements for EFW pumps and associated flow paths with the Reactor Coolant System (RCS) temperature greater than 250° F. The following test requirements have an impact on the EFW pumps and associated flow paths:

- a. T.S. 4.9.1.2 requires that if one steam generator flow path is made inoperable a dedicated qualified individual who is in communication with the control room shall be continuously stationed at the affected EFW local manual valves. On instruction from the control room operator, the individual shall realign the valves from the test mode to their operational alignment.
- b. T.S. Table 4.1-1, Section 51.a requires quarterly EFW Auto Initiation testing.

inoperable. The periodic satisfactory completion of the existing surveillance tests assures that the associated valves are OPERABLE.

5. Page 3-61

T.S. 3.15.1.3 requires testing the redundant control room air treatment system within 24 hours and daily thereafter from the time one control room air treatment system is made or found to be inoperable. This requirement reflects an earlier NRC staff position that has been revised and is not included in the revised B&W STS. By verifying the required periodic surveillance testing is current and there are no known reasons to suggest the redundant train is inoperable, adequate assurance exists that the redundant train is OPERABLE.

IV. NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPU Nuclear has determined that this TSCR involves no significant hazards consideration as defined by NRC in 10 CFR 50.92.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated.

The proposed amendment specifies an allowable outage time for testing of the EFW pumps. Also, this proposed change reflects the current NRC staff position regarding the need for additional testing to assure OPERABILITY. The allowable outage time this change provides for EFW pump testing is acceptable because the operator action required to make the motor driven EFW pump OPERABLE is minimal and can be performed in a very short time by the Control Room Operator who is continuously present during the time the motor-driven EFW pump is in the Pull-To-Lock position.

The changes affecting OPERABILITY determinations of redundant train/components for reactor building isolation valves and the control room air treatment systems reflect the current NRC staff position. Verifying that the required periodic surveillance testing is current and there are no known reasons to suggest the redundant train/component is inoperable, provides adequate assurance of system OPERABILITY.

Therefore it can be concluded that the proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment specifies an allowable outage time and deletes unnecessary redundant equipment testing. These changes do not change system operational requirements or response to system transients. Therefore, the proposed amendment does not create the possibility of a new or different kind of accident.

3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The proposed amendment specifies an allowable outage time and replaces redundant equipment testing with verification that surveillance is current as an adequate means to ensure OPERABILITY. These changes do not involve any activities associated with the margin of safety envelope. Thus, operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

V. IMPLEMENTATION

It is requested that the amendment authorizing this TSCR be effective 30 days after issuance.