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March 21, 1994
C311-94-2027

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
TMI-1 Remote Shutdown System Technical Specifications
Requirement

Reference 1 - GPU Nuclear letter 5211-87-2016 dated January 29, 1987
Reference 2 - GPU Nuclear letter 5211-87-2129 dated July 15, 1987
Reference 3 - NRC letter dated October 19, 1989

The purpose of this letter is to request NRC concurrence that the Remote Shutdown System Limiting Conditions of Operation (LCO) and surveillance requirements do not need to be incorporated in the TMI-1 Technical Specifications.

GPU Nuclear (GPUN) submitted a Technical Specification Change Request (TSCR), Ref 1 above, to incorporate LCO and surveillance requirements for specific controls and monitoring instrumentation installed for the remote shutdown system. As a result of NRC Generic Letter 86-10, GPUN withdrew the TSCR, Ref 2 above, because the Generic letter implied the remote shutdown requirements should be incorporated in the FSAR. Subsequently, the NRC staff determined that the remote shutdown system requirements should be included in Technical Specifications. In Ref 3 above, the NRC advised GPUN of this revised determination and requested GPUN to submit Technical Specifications consistent with the future revision to the B&W Standard Technical Specifications. The B&W Revised Standard Technical Specifications (RSTS) were approved by the NRC in NUREG 1430 in September 1992.

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The TMI Tech Specs do not specifically address the remote shutdown system instrumentation. However the TMI Operating License Condition 2.c.(4) states "GPU Nuclear Corp. shall implement and maintain in effect all provisions of the Fire Protection Program as described in the Updated FSAR for TMI-1." The TMI-1 Updated FSAR states in Section 9.9.2 that the TMI-1 fire protection program consists of TMI-1 Administrative Procedure AP 1038, the TMI-1 Fire Hazards Analysis Report (FHAR) and the fire protection systems.

The FHAR contains a description of the capability to achieve and maintain safe shutdown condition in the event of a fire in support of the TMI-1 Fire Protection Program functions. Procedure AP 1038 contains in Exhibit 2, Section 8 - Remote Shutdown Instrumentation And Controls - requirements for Operability and Test/Inspection.

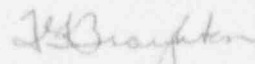
Attachment 1 provides a comparison of the RSTS to the TMI Procedure AP 1038, Section 8 requirements. A brief summary of the comparison shows:

- * The time permitted in Procedure 1038 for instrumentation to be inoperable is more stringent than the RSTS but does not contain shutdown requirements as required in the RSTS.
- * The Channel Check surveillance is on a more restrictive frequency in Procedure 1038.
- * The control circuit and transfer switch surveillance is the same frequency in the RSTS and Procedure 1038.
- * The Channel Calibration frequency is same in the RSTS and TMI Procedure 1038.

Since TMI-1 Procedure AP 1038 required by the FSAR and the License Condition contains requirements essentially the same as RSTS and in some cases more restrictive, GPUN proposes there is no need for remote shutdown Tech Specs. This approach is consistent with the philosophy of the Cost Beneficial Licensing Actions program (CBLA) in that retaining the requirements in Procedure AP 1038 versus incorporating them in the Tech Specs is safety neutral. Further, the time and costs to incorporate the requirements in the Tech Specs is not advantageous to the NRC or GPUN.

Based on the above, GPUN requests the NRC approve this approach and close out the GL 86-10 actions.

Sincerely,



T. G. Broughton
Vice President and Director, TMI

DVH

Attachment

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

ATTACHMENT 1

REMOTE SHUTDOWN SYSTEM
COMPARISON OF RSTS REQUIREMENTS
TO TMI PROCEDURE 1038 REQUIREMENTS

RSTS LCO REQUIREMENTS:

If one or more required functions are inoperable, restore required function to Operable status within 30 days. If this condition is not met be in Mode 3 (Hot Standby) within 6 hours and Mode 4 (Hot Shutdown) within 12 hours.

TMI PROCEDURE AP 1038, EXHIBIT 2, SECTION 8 REQUIREMENTS:

8.3.1 Remote shutdown instrumentation and controls are required to be operable during all reactor operating conditions except cold shutdown or refueling.

8.3.2 When inoperable, restore to operable status within 7 days or provide compensatory measures.

8.3.3 If not restored to operable status within 7 days, prepare a potentially reportable event form per AP 1044, report and determine reportability using the criteria of 10 CFR 50.72 and 10 CFR 50.73. This review shall also determine and ensure the adequacy of any compensatory measures.

RSTS SURVEILLANCE REQUIREMENTS:

3.3.18.1 Perform CHANNEL CHECK for each required instrumentation channel that is normally energized with a frequency of 31 days.

TMI PROCEDURE AP 1038, EXHIBIT 2, SECTION 8 REQUIREMENTS:

8.4.1 Remote shutdown instrumentation that continuously displays shall be verify OPERABLE by performance of a weekly check.

RSTS SURVEILLANCE REQUIREMENTS:

Section 3.3.18.2 Verify each required control circuit and transfer switch is capable of performing the intended function with a frequency of [18] months.

ATTACHMENT 1 Cont'd

TMI PROCEDURE AP 1038, EXHIBIT 2, SECTION 8 REQUIREMENTS:

8.4.2 Circuit isolation transfer switches, control functions and status indicators shall be demonstrated OPERABLE by verifying the capability to perform intended functions once each refueling.

RSTS SURVEILLANCES REQUIREMENTS:

3.3.18.3 Perform CHANNEL CALIBRATION for each required instrumentation channel with a frequency of [18] months.

TMI PROCEDURE AP 1038, EXHIBIT 2, SECTION 8 REQUIREMENTS:

8.4.3 Calibration of instrumentation shall be performed once each refueling.