



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 29, 1994

Docket No. 50-289
License No. DPR-50
CAL No. 1-94-004

Mr. T. Gary Broughton, Vice President
and Director - TMI-1
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057

Dear Mr. Broughton:

SUBJECT: THREE MILE ISLAND UNIT 1 - CONFIRMATORY ACTION LETTER (CAL)
1-94-004 REGARDING CYCLE 10 CONTROL ROD DROP TIMES (TAC No. M89053)

The purpose of this letter is to confirm our understanding of those actions you have taken or plan to take as the result of rod drop testing on March 17 and 18, 1994. During the testing, the drop times of 12 control rods exceeded the 1.66-second limit in the Three Mile Island, Unit 1 (TMI-1) Technical Specifications.

On March 25, 1994, a meeting was held with you, senior managers for GPU Nuclear Corporation, and senior members of the NRC staff to discuss your basis for startup and continued operation of TMI-1. The meeting was held at NRC headquarters in Rockville, Maryland. Following the meeting, the NRC staff communicated to Mr. Michael Laggart, of your staff, certain commitments that if agreed to, would constitute acceptable justification for startup and operation of TMI-1. In a letter of March 26, 1994, you submitted your formal basis for and your intent to resume power operation of TMI-1 on that same date. In your letter, you committed to perform the following actions:

1. GPU Nuclear requested that Technical Specification Change Request (TSCR) No. 242, submitted March 22, 1994, be withdrawn. Exigent circumstances regarding control rod drop time test criteria no longer exist, as all control rods are currently within existing Technical Specification requirements.
2. GPU Nuclear will perform the following short-term corrective action to minimize crud buildup within the control rod drive mechanism.
 - A. Increase Lithium concentration in the Reactor Coolant System (RCS) to raise pH to reduce the rate of corrosion.
 - B. Control rod drive mechanisms will be exercised every 2 weeks during the remainder of Cycle 10 to reduce the likelihood of crud buildup in the gap between the lead screw and the thermal barrier bushing.
 - C. Control rod drop times will be obtained within 3 months of reactor startup.

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Docket file

3. Within 2 months of the date of this letter, GPU Nuclear will submit their evaluation criteria and a contingency plan to be utilized for the control rod drop time test described in 2C above.
4. If TMI-1 experiences an unplanned shutdown prior to the control rod drop time test described in 2C above, GPU Nuclear will verify that all control rods are within the existing Technical Specification acceptance criterion of 1.66 seconds.
5. If during control rod drop time testing conducted in accordance with Items 2C and 4 above, any control rod exceeds the 1.66 second drop time criterion, such rods will not be exercised prior to obtaining NRC approval.
6. If during control rod drop time testing conducted in accordance with Items 2C and 4 above, any control rod fails the 1.66 second drop time criterion, NRC approval may allow exercising these rods to within drop time criterion. If NRC approval is not obtained to exercise these rods, or these rods cannot be exercised to within the 1.66 second drop time criterion, at least one control rod drive mechanism will be removed and inspected.
7. Within 6 months of the date of this letter, GPU Nuclear will provide a long-term plan to address necessary actions to improve control rod drive mechanism performance and reliability. The intent of this plan is to ensure that control rods will continue to satisfy the current Technical Specification drop time criterion of 1.66 seconds.

The staff has reviewed the above commitments and has found them acceptable. On March 26, 1994, the NRR Project Manager for TMI-1 verbally notified you of our finding.

Pursuant to Section 182 of the Atomic Energy Act of 1954, as amended, 42 U.S.C. 2232, and 10 CFR 2.204, you are required to:

1. Notify me immediately if your understanding differs from that set forth above.
2. Notify me if for any reason you cannot complete the actions within the specified schedule and advise me in writing of your modified schedule in advance of the change, and
3. Notify me in writing when you have completed the actions addressed in this Confirmatory Action Letter.

Issuance of this Confirmatory Action Letter does not preclude issuance of an order formalizing the above commitments or requiring other actions on the part of GPU Nuclear. Nor does it preclude the NRC from taking enforcement action for violations of NRC requirements that may have prompted the issuance of this letter. In addition, failure to take the actions addressed in this Confirmatory Action Letter may result in enforcement action.

The responses directed by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the *Paperwork Reduction Act* of 1980, Pub. L. No. 96-511.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room.

Sincerely,

[original signed by A. Thadani]

William T. Russell, Director
Office of Nuclear Reactor Regulation

for

cc: See next page

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Mr. T. Gary Broughton

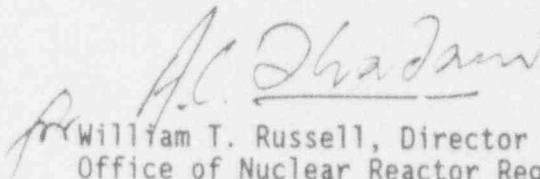
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Sincerely,


William T. Russell, Director
Office of Nuclear Reactor Regulation

cc: See next page

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