

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. 238 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:

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Director Bureau of Radiation Protection
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GPU NUCLEAR CORPORATION

BY: *JEBroughton*
Vice President and Director, TMI

DATE: April 11, 1994

ENCLOSURE

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 238

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications: 3-95, 4-35, 4-36, and 4-37. The following page is deleted: 4-35a.

II. REASON FOR CHANGE

This change is requested to modify the TMI-1 Technical Specifications to specify that periodic testing and inspection of tendons shall be performed in accordance with the surveillance program as described in the TMI-1 FSAR, and to relocate the detailed requirements and criteria of the existing tendon surveillance program to the FSAR. This change is consistent with the Babcock and Wilcox Owners' Group (BWO) Revised Standard Technical Specifications (NUREG-1430), Revision 0, dated September 28, 1992, Section 3.6.1 - Containment. It is our intent to utilize the updated criteria of U.S. NRC Regulatory Guide 1.35, Revision 3, July 1990 for the next scheduled tendon surveillance. This change will facilitate implementation of such revisions to the surveillance program under 10 CFR 50.59. The update to the TMI-1 FSAR will provide the detailed description of the tendon surveillance program.

Also, Technical Specification Section 4.4.2.1.3, Containment Surfaces, is deleted as this requirement is redundant to the requirement contained in Technical Specification Section 4.4.1.4.

III. SAFETY EVALUATION JUSTIFYING CHANGE

Relocation of the detailed surveillance program requirements and criteria to the TMI-1 FSAR is consistent with the BWO Revised Standard Technical Specifications, Revision 0, dated September 28, 1992. This change will facilitate implementation of program changes through the 10 CFR 50.59 process and thus eliminate the need for processing future technical specification change requests. Thereby unnecessary regulatory burden for GPU Nuclear and NRC resources is reduced. The TMI-1 Inservice Tendon Surveillance Program is conducted in accordance with TMI-1 Surveillance Procedure SP 1301-9.1, "Reactor Building Structural Tendon Surveillance Program," and conforms to the recommendations of the U.S. NRC Regulatory Guide 1.35, proposed Revision 3, "Inservice Surveillance of UngROUTED Tendons in Prestressed Concrete Containment Structures." This program is currently described in TMI-1 FSAR Section 5.7.5.

The proposed change revises Technical Specification Section 3.19.1 wording to be consistent with the BWO Revised Standard Technical Specification. Technical Specification Section 3.19.1.1 is revised to reference inservice tendon surveillance program requirements for tendon lift off forces in lieu of the specific reference to Section 4.4.2.1.1.b which provided the detailed

lift off requirement and is being relocated to the FSAR description.

The proposed change relocates the detailed tendon surveillance program requirements and criteria from existing Technical Specification Sections 4.4.2.1.1 and 4.4.2.1.2 to the TMI-1 FSAR, Section 5.7.5. The proposed change also adds a Bases Section to clarify that containment structural integrity will be maintained in accordance with the provisions of the TMI-1 Reactor Building Structural Integrity Tendon Surveillance Program, and that testing and frequency are consistent with the recommendations of Regulatory Guide 1.35 as described in the FSAR. Programmatic control of the Inservice Tendon Surveillance Program is ensured by maintaining the existing Technical Specification Section 4.4.2.1 requirement.

The action statement associated with Technical Specification Section 3.19.1.1, regarding shutdown if containment structural integrity cannot be restored to within limits, is not changed by this request. The reporting requirements in Technical Specification Sections 3.19.1 and 4.4.2.1.6 are not affected by the proposed change.

TMI-1 FSAR Section 5.7.5 will describe the detailed inservice tendon surveillance program requirements and criteria currently outlined in Technical Specification Section 4.4.2.1. The revised Technical Specification Section 4.4.2.1 and Bases specify that the inservice tendon surveillance program requirements conform to the requirements of U.S. NRC Regulatory Guide 1.35. Any future changes to the tendon surveillance program as described in the TMI-1 FSAR will be controlled under the 10 CFR 50.59 process which will ensure that the effectiveness of the program is not reduced by such changes. Surveillance program changes will be reflected in future FSAR updates, as appropriate, in accordance with 10 CFR 50.71e.

Technical Specification Section 4.4.2.1.3, Containment Surfaces, is deleted as this requirement is a redundant restatement of the 10 CFR 50 Appendix J inspection requirements currently contained in Technical Specification Section 4.4.1.4. This is an administrative change since the affected Technical Specification surveillance requirements are contained in their entirety in Technical Specification Section 4.4.1.4.

Technical Specification Section 3.19.1.2 is deleted since this requirement only specified the potential reportability of not conforming to the tendon surveillance program requirements, under 10 CFR 50.72 and 10 CFR 50.73. This section is wholly redundant to the regulations cited and need not be contained in this Technical Specification to ensure consideration of reportability. Therefore, this is considered an administrative change.

Technical Specification Section 4.4.2, Bases is also revised to indicate the original basis for existing Technical Specification Section 4.4.2.1.4 and 4.4.2.1.5 inspection requirements. This change provides additional clarification to the Bases and is therefore an administrative change.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION

GPU Nuclear has determined that this Technical Specification Change Request 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 only relocates the tendon surveillance program detailed requirements and criteria to the FSAR, consistent with the BWOOG Revised Standard Technical Specifications. The proposed amendment does not affect the requirement to verify containment structural integrity in accordance with the inservice tendon surveillance program. The proposed Technical Specification specifies that the tendon surveillance program conforms to the recommendations of U.S. NRC Regulatory Guide 1.35, which ensures the effectiveness of the program is not reduced and containment structural integrity is not affected. Therefore, this change does not increase the probability of occurrence or the 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 tendon surveillance program is required to conform to the recommendations of U.S. NRC Regulatory Guide 1.35. Therefore, the effectiveness of the surveillance program is maintained, thus providing continued assurance of containment structural integrity.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety. The performance of the inservice tendon surveillance program is maintained in conformance with the recommendations of U.S. NRC Regulatory Guide 1.35, thus providing continued assurance of containment structural integrity. Therefore, it is concluded that operation of the facility in accordance with the proposed amendment does not involve a reduction in a margin of safety as defined in the basis of any Technical Specification.

V. IMPLEMENTATION

It is requested that the amendment authorizing this change become effective upon issuance.