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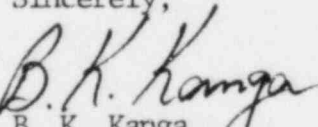
TMI Program Office
Attn: Mr. L. H. Barrett, Deputy Program Director
US Nuclear Regulatory Commission
c/o Three Mile Island Nuclear Station
Middletown, PA 17057-0191

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Recovery Operations Plan Change Request No. 21

The attached Recovery Operations Plan Change Request is submitted in order to allow the suspension of selected surveillance requirements under circumstances where performing them may jeopardize the safety of certain operations and/or the safety of the public. The suspension of surveillance would be subject to review and approval by both GPU and NRC prior to the actual suspension.

If you have any questions or desire further information, please contact Mr. J. E. Larson of my staff.

Sincerely,

B. K. Kanga
Director, TMI-2

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BKK/RBS/jep

Attachment

CC: Dr. B. J. Snyder, Program Director - TMI Program Office

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U.S. NUCLEAR
REGULATORY COMMISSION

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

I. Recovery Operations Plan Change Request No. 21

The licensee requests that the attached page 4.0-1 of the Recovery Operations Plan replace the existing page 4.0-1 of the Recovery Operations Plan.

II. Reason for Change

This change will allow surveillance requirements on certain components to be postponed during operations where performing surveillance on those components may be proven unsafe by the Safety Evaluation for that operation. The change will eliminate the need for unnecessary paperwork without affecting the safety of the operation.

III. Safety Evaluation Justifying Change

In the course of performing future recovery operations, it may be found necessary, in the safety evaluation covering that change, to suspend the surveillance requirements on some system for safety reasons. This change will permit suspension of surveillance without requiring a change to the Recovery Operations Plan or affecting the safety of any proposed operation or the public. The safety of any operation will still be subject to GPU internal safety reviews and to NRC review and approval before implementation. This review is twofold in that the safety evaluation for any planned major recovery effort is submitted to the NRC as well as any required implementing procedure being approved by the NRC pursuant to Technical Specification 6.8.2. As stated before, these reviews and approvals are in addition to GPU internal reviews. Requiring individual Recovery Operations Plan Changes to be submitted only requires additional paperwork without furthering the safety review. Therefore, this change is submitted for your review and approval. This change also corrects a typographical error from a previous change regarding the time interval allowed between consecutive surveillance tests. The interval should be 3.25 surveillance intervals between four consecutive tests rather than between three tests.