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February 16, 1995  
 C311-95-2031

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

Subject: Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
 Possession Only License No. DPR-73  
 Docket No. 50-320  
 Submittal of Three Mile Island Nuclear Station  
 Technical Specification Change Request No. 72

GPU Nuclear (GPUN) requests Technical Specification 4.1.1.3 be modified to extend the surveillance interval for the demonstration of operability for each Containment Air Lock from the current quarterly interval to an annual interval. GPUN also requests that Technical Specification 4.0.2 be revised to delete 4.0.2.b and to add Technical Specification 4.0.4 to incorporate a 24 hour delay period to allow for the completion of a missed surveillance. In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 72.

Pursuant to 10 CFR 50.91(a)(1), TSCR No. 72 has been distributed as specified by 10 CFR 50.4 and the enclosed significant hazards consideration determination has been completed by applying the standards of 10 CFR 50.92. A signed copy of the Certificate of Service to the chief executives of Londonderry Township and Dauphin County and the designated representative of the Commonwealth of Pennsylvania is also enclosed.

Sincerely,

T. G. Broughton  
 Vice President and Director, TMI

JSS/mkk

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Enclosures: 1) Technical Specification Change Request No. 72  
 2) Certificate of Service for Technical Specification Change Request No. 72

cc: M. G. Evans - TMI Senior Resident Inspector  
 T. T. Martin - Administrator, Region I  
 M. T. Masnik - PDNP TMI-2 Project Manager

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
GPU NUCLEAR CORPORATION

DOCKET NO. 50-320  
POSSESSION ONLY LICENSE NO. DPR-73

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 72 to Appendix A of the Possession Only License for Three Mile Island Nuclear Station Unit 2, 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. Jay H. Kopp, 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  
Third Floor, Fulton Building  
Third and Locust Streets  
P. O. Box 4693  
Harrisburg, PA 17105-4693  
Attn: Mr. Robert R. Barkanic

GPU NUCLEAR CORPORATION

BY: JJ Braughton  
Vice President and Director, TMI

DATE: February 16, 1995

I: TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 72

GPUN requests the following new page and changed replacement pages be inserted into the existing Technical Specifications (TS):

Revised page 3/4.0-1: To revise TS 4.0.2 and add new TS 4.0.4

Revised page 3/4.1-4: To revise TS 4.1.1.3

Revised page B3/4.0-1: To revise Bases 4.0.2

New page B3/4.0-2: To add Bases 4.0.4

II. REASON FOR CHANGE

IIa. The changes to TS section 4.0.2 of the SURVEILLANCE REQUIREMENTS of the TMI-2 TS are administrative in nature and are being proposed to make the TMI-2 TS consistent with TMI-1 TS.

The proposed change to the TMI-2 TS rewords Specification 4.0.2 and eliminates subsection 4.0.2.b to make the TMI-2 Surveillance Requirements consistent with the TMI-1 Surveillance Requirements in this area.

The proposed change adds TS 4.0.4 to allow a delay time of 24 hrs. to complete a missed surveillance to TMI-2 TS. This change is being proposed to make the TMI-1 and TMI-2 TS consistent in the area of Surveillance Requirements.

IIb. The change to SURVEILLANCE REQUIREMENT 4.1.1.3 of the TMI-2 TS to extend the required surveillance interval for the demonstration of operability for each Containment Air Lock from 3 months to annually is being proposed to eliminate unnecessary radiation exposure and to make the surveillance frequency for the Containment Air Lock doors consistent with that of other locked containment isolation barriers.

III. SAFETY EVALUATION JUSTIFYING CHANGES

IIIa. The modification of TS Section 4.0.2 to clarify the maximum allowable extension of the surveillance interval and the addition of TS 4.0.4 to allow a 24-hour delay period in which to perform a missed surveillance have no impact on plant operation or effluents. These administrative changes will make the TMI-2 TS for Surveillance Requirements consistent with the TMI-1 TS for Surveillance Requirements. These changes will eliminate a potential source of confusion and provide a consistent standard for the timely performance of surveillance tasks at both TMI-1 and TMI-2.

IIIa.(1) TMI-1 Technical Specification 4.0.2 states:

"If it is discovered that a surveillance was not performed within its specified frequency, then compliance with the requirement to declare the LCO not met may be delayed, from the time of discovery, up to 24 hours or up to the limit of the specified frequency, whichever is less. This delay period is permitted to allow performance of the Surveillance."

Current TMI-2 TS do not allow a delay time of 24 hours to complete a missed surveillance. Adding this provision to TMI-2 TS as TS 4.0.4 is also consistent with the guidance provided in GL 87-09 and the NRC RSTS in NUREG-1430 and is deemed to allow a reasonable period of time to demonstrate operability of components or to otherwise determine compliance with TS requirements. In addition, making the TMI-2 Technical Specification requirements regarding the performance of surveillances identical to those of TMI-1 TS will decrease the possibility of mistakes in scheduling by eliminating a possible source of confusion. This is because the scheduling of Technical Specification surveillances for both TMI-1 and TMI-2 is performed by the same organization, the TMI Maintenance Scheduling group, and the same computer system, the GMS-2 system.

IIIa.(2) TMI-1 Technical Specification definition 1.25, FREQUENCY NOTATION states in part that all Surveillance Requirements shall be performed within the specified time interval with a maximum allowable extension not to exceed 25% of the surveillance interval. Similarly, TMI-2 Technical Specification 4.0.2.a states that Surveillance Requirements must be performed within the specified time interval with a maximum allowable extension of 25%. However, TMI-2 Technical Specification 4.0.2.b states that a total maximum combined interval time for any four consecutive tests can not exceed 3.25 times the specified surveillance interval. This additional requirement has no technical basis, nor is it included in the NRC Revised Standard Technical Specifications (RSTS) in NUREG-1430. This requirement was previously deleted from the TMI-1 TS in accordance with the guidance provided in Generic Letter (GL) 89-14 dated August 21, 1989. Deletion of this requirement is acceptable because it has no effect on plant safety.

IIIb. Extending the surveillance interval for the demonstration of Containment Air Lock operability from every 3 months to annually has no impact on plant operations or effluents. The change will eliminate unnecessary exposure to radiation.

TS 4.1.1.3 currently specifies a surveillance interval of every 3 months. The performance of quarterly Containment Air Lock door operability surveillances incur 50 person-mrem per inspection. Extending the Containment Air Lock door surveillance frequency from a quarterly interval to an annual interval will eliminate 150 person-mrem of unnecessary exposure.

The results of the Containment Air Lock operability surveillance inspections performed during 1994 did not detect any degradation of Containment Air Lock operability throughout the year. However, the performance of the Containment Air Lock operability surveillance requires the opening of the Air Lock doors which cycles the mechanical components. Extending the Containment Air Lock

surveillance frequency from quarterly to annual eliminates unnecessary cycling of the mechanical components which enhances long term reliability.

In addition, the change in the surveillance interval from 3 months to annually for the demonstration of Containment Air Lock operability will make the surveillance interval consistent with the annual surveillance interval specified for the verification of CONTAINMENT ISOLATION. With the exception of Containment Air Locks, other locked Containment isolation barriers, e.g. valves, are required to be verified by visual inspection on an annual STAGGERED TEST BASIS. Thus, adoption of the requested change will establish a consistent surveillance interval for locked Containment isolation barriers.

- IV. GPUN has determined that Technical Specification Change Request No. 72 involves no significant hazards consideration as defined in 10 CFR 50.92.

IVa. Proposed Surveillance Requirement Changes

1. The proposed changes to the TMI-2 TS do not involve a significant increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously analyzed in the safety analysis report. The changes have no impact on plant operations or the release of radioactive materials. The clarification of the maximum allowable extension time for a surveillance interval makes TMI-2 surveillance requirements consistent with those for TMI-1 and the NRC RSTS in NUREG-1430.
2. The proposed changes to the TMI-2 TS will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report because no plant configuration or operational changes are involved.
3. The changes will not involve a significant reduction in the margin of safety as defined in the basis for any technical specification for TMI-1 because no change to operational limits will be made.

IVb. Proposed Change in Surveillance Interval for RB Air Lock Doors

1. The proposed change to the Containment Air Lock operability surveillance does not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated in the safety analysis report. Opening the Containment Air Lock doors less frequently means there is less chance of the release of radioactive material into the environment via the doors. In addition, the probability of a malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased because the equipment in question, the Containment Air Lock doors, will be cycled less often under the proposed changes.

2. The proposed change does not create the possibility for a accident or malfunction of a different type than any previously evaluated in the safety analysis report because it will only change the frequency of a TS required surveillance.
3. The proposed change does not involve a significant reduction in a margin of safety because no change to operational limits will be made.

V. IMPLEMENTATION

GPUN requests the amendment authorizing TSCR No. 72 be effective upon issuance.