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July 10, 1984  
5211-84-2149

Office of Nuclear Reactor Regulations  
Attn: John F. Stolz, Chief  
Operating Reactors Branch No. 4  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Stolz:

Three Mile Island Nuclear Station, Unit I (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Inservice Testing of Pumps & Valves (IST) Program Submittal

The purpose of this letter is to transmit GPUN's program for Inservice Testing (IST) of pumps and valves whose function is required for safety. This is the program submittal which was discussed in our letter of June 13, 1984. The objective of the IST program is to provide assurance of the operability of Class 1, 2, and 3 pumps and valves.

During the 120-month testing program which is applicable from September, 1984, until September, 1994, GPUN is required by 10 CFR 50.55a(g)(4)(ii) to follow the ASME Boiler and Pressure Vessel Code Section XI Division I, 1980 edition and addenda through Winter, 1980. In addressing the applicable ASME Code Edition and Addenda, GPUN is required by 10 CFR 50.55a(g)(5)(iv) to demonstrate the bases for the determination where inservice testing code requirements are determined to be impractical. This is to be demonstrated to the satisfaction of the NRC not later than 12 months after the expiration of the initial 120 month period of operation from start of facility commercial operation (September, 1985.)

Table A (attached) applies to all Class 1, 2, and 3 pumps which are provided with an emergency power source. Subtable A-1 describes the pump testing program. Subtable A-2 provides GPUN's request for relief from ASME Code Section XI pump test requirements along with justification for the relief.

Table B (attached) applies to all Class 1, 2, and 3 valves. Subtable B-1 describes the valve testing program. Subtable B-2 provides GPUN's request for relief from ASME Code Section XI valve test requirements along with justification for the relief.

Dwgs TO J. VANULIET

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Mr. John F. Stolz

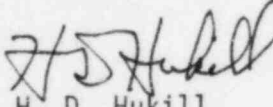
Enclosed with this submittal are two copies of the IST drawings which are referenced in Tables A and B. Copies of Piping and Instrumentation Drawings (P&IDs) were provided to NRC prior to our meeting on IST which occurred on May 15, 1984.

The Inservice Testing Program which is described in Tables A and B is permitted by the current Technical Specifications. Therefore, GPUN sees no conflict between TMI-1 Technical Specifications and the updated Inservice Testing program and concludes that Section 50.55a(g)(5)(ii) of the regulation has been met.

Requests for additional relief resulting from plant design modifications during the period for which this program is applicable will be requested as necessary through further correspondence. However, GPUN does not view changes to the ISI program which become necessary as requiring a submittal other than through the reporting requirements of 10 CFR 50.59 unless additional relief from ASME Code Section XI requirements or changes to the Technical Specifications are needed.

This submittal is being forwarded as an application for approval in accordance with the Final Rule on 10 CFR 170, Revision of Licensee Fee Schedule published in the Federal Register on May 21, 1984. Therefore, our check for \$150.00 is being provided under separate cover.

Sincerely,

  
H. D. Hukill,  
Director, TMI-1

HDH/MRK/mle

Enclosures

cc: R. Conte