



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

January 5, 1996

Mr. J. Knubel, Vice President
and Director - TMI
GPU Nuclear Corporation
Post Office Box 480
Middletown, PA 17057-0480

SUBJECT: THREE MILE ISLAND, UNIT 1 (TMI-1) - SAFETY EVALUATION OF REQUEST
FOR EXEMPTION FROM CERTAIN REQUIREMENTS OF APPENDIX R TO
10 CFR PART 50 (TAC NO. M92617)

Dear Mr. Knubel:

By letter of May 25, 1995, GPU Nuclear Corporation (GPUN) submitted for NRC approval, a request for exemption from Section III.G.2.c of Appendix R to 10 CFR Part 50, to the extent that it requires the enclosure of cable and equipment and associated non-safety circuits of one redundant train in a fire barrier having a 1-hour rating. Specifically, GPUN requested an exemption from the technical requirements of Section III.G.2.c of Appendix R to 10 CFR Part 50, to the extent that it requires enclosure in a fire barrier having a 1-hour rating of the 15-inch long, 9-inch wide and 6-inch high cable tray installed in Fire Zone 1 of the Intake Screen and Pumphouse. To support the request, GPUN performed an evaluation that concluded that the existing cable tray configuration protected with Thermo-Lag 330-1 material has a rating of 48 minutes.

We have reviewed your request for an exemption and have found that GPUN has not adequately demonstrated that the special circumstances required by 10 CFR 50.12 to consider an exemption are present, nor that the proposed level of fire protection is equivalent to that specified in Appendix R to 10 CFR Part 50. The exemption is therefore denied. Our Safety Evaluation, which discusses in detail the reasons for denial, is enclosed (Enclosure 1).

Your May 25, 1995, letter also stated that GPUN intends to use the Electric Power Research Institute (EPRI) developed "Fire Hazard Tool" and "Performance Rating Tool" in future exemption request submittals. The staff has serious concerns with the application of the "tools" developed under the EPRI Tailored Collaboration effort. These concerns were provided in a letter dated December 29, 1995, to Crystal River, Unit 3, a Nuclear Energy Institute (NEI) Thermo-Lag lead plant. A copy of that letter is enclosed for your information (Enclosure 2). Please be advised that future submittals should address these concerns if GPUN intends to pursue the use of the EPRI Tailored Collaboration Tools.

Although not the subject of this request, GPUN stated in the evaluation provided with the exemption request (Topical Report #094, Rev. 0) that the use of cable with an equivalent fire rating of either 1 or 3-hours, either

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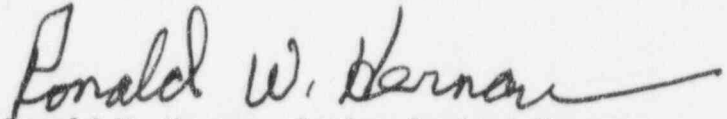
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independently or in conjunction with a fire barrier, complies with the requirements specified in Section III.G of Appendix R to 10 CFR Part 50. This is not correct. The staff, in Enclosure 2 of Generic Letter 86-10, Question 8.10, stated that an exemption or deviation would be required if such cable is used in lieu of the alternatives specified in Section III.G of Appendix R.

Sincerely,

A handwritten signature in cursive script that reads "Ronald W. Hernan". The signature is written in dark ink and has a long, sweeping horizontal line extending to the right.

Ronald W. Hernan, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosures: As stated

cc w/encls: See next page

J. Knubel
GPU Nuclear Corporation

Three Mile Island Nuclear Station,
Unit No. 1

cc:

Michael Ross
Director, O&M, TMI
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Robert B. Borsum
B&W Nuclear Technologies
Suite 525
1700 Rockville Pike
Rockville, MD 20852

John C. Fornicola
Director, Planning and
Regulatory Affairs
GPU Nuclear Corporation
100 Interpace Parkway
Parsippany, NJ 07054

William Dornsife, Acting Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P.O. Box 2063
Harrisburg, PA 17120

Jack S. Wetmore
Manager, TMI Regulatory Affairs
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Dr. Judith Johnsrud
National Energy Committee
Sierra Club
433 Orlando Avenue
State College, PA 16803

Ernest L. Blake, Jr., Esquire
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW.
Washington, DC 20037

Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Harrisburg, PA 17120

Chairman
Board of Supervisors
of Londonderry Township
R.D. #1, Geyers Church Road
Middletown, PA 17057

Michele G. Evans
Senior Resident Inspector (TMI-1)
U.S. Nuclear Regulatory Commission
P.O. Box 311
Middletown, PA 17057

Regional Administrator, Region I
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

J. Knubel

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independently or in conjunction with a fire barrier, complies with the requirements specified in Section III.G of Appendix R to 10 CFR Part 50. This is not correct. The staff, in Enclosure 2 of Generic Letter 86-10, Question 8.10, stated that an exemption or deviation would be required if such cable is used in lieu of the alternatives specified in Section III.G of Appendix R.

Sincerely,

Original signed by:

Ronald W. Hernan, Senior Project Manager
Project Directorate I-3
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosures: As stated

cc w/encls: See next page

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