

JAN 30 1985

DMB 016

Docket No. 50-289

MEMORANDUM FOR: W. Houston, Assistant Director for Reactor Safety, DSI

FROM: Gus Lainas, Assistant Director for Operating Reactors, DL

SUBJECT: LICENSEE APPEAL OF ALLEGED BACKFIT REQUIREMENT FOR TMI-1

The staff is reviewing the submittals from General Public Utilities Corporation (GPUN) that respond to multiplant action (MPA) B-24 concerning containment purge and vent. In its review, the Containment System Branch concluded that the staff needs a report after the next cycle of operation that identifies the actual amount of purging during the next cycle, an analysis of the benefits of purging, and actions taken to minimize containment entries. By letter from J. Stolz (NRC) to H. Hukill, GPUN, dated December 5, 1984, the staff requested the licensee to provide the report following shutdown for cycle 6 refueling.

The licensee's response dated January 11, 1985, (attached) appeals the staff's request on the basis that, among other things, it is a "backfit" requirement in accordance with the proposed backfit requirements of SECY. 83-321. IE the licensee has already agreed to meet the staff's explicit purging requirements in MPA B-24. In accordance with H. Denton's memorandum on Backfitting dated October 25, 1983, and D. Eisenhuts memorandum on Plant Specific Backfitting Procedures dated April 13, 1984, the issue "Reporting on Purging at TMI-1" is identified as a Backfit. This issue will be listed in the DL Backfit tracking system.

In accordance with procedures for resolving Backfits, I request a statement of your position on the issue by January 31, 1985 so that the staff's written position is available before the Backfit Appeal Meeting. (This submittal date is acceptable to CSB staff). The licensee's position on the issue is stated in the January 11 response.

The Backfit Appeal Meeting is scheduled for Tuesday, February 5, 1985 at 10am in Room Air Rights 5033, Bethesda, Maryland. I request that you and your appropriate technical staff be present.

"ORIGINAL SIGNED BY:"

Gus Lainas, Assistant Director
for Operating Reactors, DL

Attachment: As Stated

cc:

D. Eisenhut	S. Varga
R. Barnero	E. Reeves
W. Butler	G. Holahan
J. Kudrick	J. Stolz
M. Fields	J. Van Vliet
O. Thompson	PDR

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5211-85-2008
January 11, 1985

Office of Nuclear Reactor Regulation
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 No1 DPR-50
Docket No. 50-289
Reactor Building Purging, Summary Report

Your letter of December 5, 1984, regarding containment purging, requested that GPUN provide a summary report after the first cycle of operation after restart that contains (1) the actual number of hours of purging for each of the operations or combination of operations listed in T.S. 3.6.9, (2) an analysis of the benefits of purging in terms of reduction in radiation exposure to plant personnel, and (3) the actions taken to minimize personnel entries. We agree with your conclusion that our proposed Technical Specification requirements combined with other actions to limit off-site doses are adequate. Since these specifications and actions are deemed adequate, we do not agree that our proposed Technical Specification (T.S.) purging restrictions (3.6.10) need to be compared with future operating experience.

GPUN had previously been allowed to conduct unrestricted containment purging during operation. To date, in addressing the generic concern of purging and venting containments, GPUN has (1) adopted more restrictive T.S. primary coolant activity limits, (2) limited containment purge valves to a nominal 30° open while purging is conducted during STARTUP, HOT STANDBY and POWER OPERATION, (3) agreed to limit purging during these modes to the seven activities listed in proposed specification 3.6.10, (4) added a specification requiring these activities be scheduled to coincide to minimize instances of purging, (5) enhanced T.S. actions associated with an inoperable purge isolation valve, (6) specified purge valve seat replacement intervals in the T.S., (7) provided analysis which demonstrates the protection of safety related equipment down stream of the purge valves from adverse environment during a LOCA, (8) committed to installing debris screens on the purge lines, (9) provided an analysis which demonstrated the negligible effect of purge valve closure time on ECCS containment pressure response, (10) adopted purge valve test frequency and acceptance criteria in the proposed specification, (11) shown that the valves

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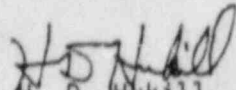
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will close from the nominal 30° open angle against the buildup of containment pressure in the event of a LOCA. These actions, analyses and Technical Specifications provide sufficient assurance that TMI-1 containment purging activities will be managed in a prudent manner and will not endanger the public health and safety.

Additionally, your request for a summary report of purging activities is not consistent with the proposed rulemaking on "Backfitting" 10 CFR 50.109. The staff has not provided either an analysis of any substantial increase in the protection of the public health and safety to be derived from this report or an analysis of the monetary cost considerations (i.e., manhours) incurred in providing this report. Standard Review Plan, Standardized Technical Specifications, and other NRC guidelines have been adopted by GPUN which adequately address the generic concern of containment purging and venting.

There are currently no NRC guidelines (e.g. Reg Guides, NUREG's, SRP's) which either endorse or provide any basis for the subject report. GPUN has adopted the ALARA concept and maintains sufficient records, reporting requirements and Technical Specifications to validate our management goals and techniques. The ALARA concept is utilized in conducting many activities which do not have the additional, excessive reporting requirements you propose for purging activities. The requested summary report represents a significant administrative effort with no apparent benefit. Appropriate records of activities in this area are available on-site for NRC inspection.

Sincerely,


H. D. Hukill
Director, TMI-1

HDH:RAS:chc

cc: R. Conte
J. Van Vliet
O. Thompson