

June 23, 1963

Note to: Jim Van Vliet, Project Manager, TMI-1

From: Mack Cutchin, Attorney, OELD

SUBJECT: PROPOSED NSHC DETERMINATION ON REDUCED VENTILATION SYSTEM AIR FLOW

On June 22nd NRR forwarded to OELD a "standard-individual" notice of consideration of issuance, proposed NSHC determination and opportunity for hearing on an OL amendment that would approve TS changes to permit operation of TMI-1 with reduced flow in the auxiliary and fuel handling exhaust air treatment system.

As a basis for the NSHC determination the FR notice says simply that:

The reduced flows will increase somewhat the airborne concentration of radioactivity in the Auxiliary Building and fuel handling areas, but will not influence substantially the radioactivity released from the facility during normal operation or during an accident involving fuel handling. The original design bases for the system as identified in the FSAR are likely to be met with the reduced flows.

Nowhere in the package, which includes GPUN's application, is there any apparent factual basis for these assertions. GPUN is asking that the TS limits on air flow be changed from 118,000 CFM  $\pm 10\%$  (i.e., 106,200 CFM to 129,800 CFM) to 90,400 CFM to 129,800 CFM, (i.e., 118,000 CFM  $\pm \frac{10.7\%}{23.4\%}$ ).

Moreover, the FR notice does not specifically address each of the three prongs of the test for whether NSHC is involved. It should provide the Staff's basis for preliminarily concluding that the amendment does not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) involve a significant reduction in a margin of safety

The portions of the test that are underlined above appear particularly important to the determination on this amendment package.

Until these deficiencies in the FR notice are cured, I cannot recommend OELD approval of the NSHC determination or concurrence in the FR notice.

cc: A. DeAgazio      J. Scinto  
    J. Stolz          J. Gray  
    D. Wigginton

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