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February 13, 1985

Office of Nuclear Reactor Regulation Attn: J. F. Stolz, Chief Operating Reactor Branch No. 4 Division of Licensing U.S. Nuclear Regulatory Commission Washington, D.C. 20555

Dear Mr. Stolz:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inspection Report (I.R.) 84-37: Comment

NRC Inspection Report 84-37 dated January 3, 1985 states incorrectly (Section 4.0) that the controls for Emergency Feedwater Pump Recirculation Valves EF-V8 A, B and C are to be upgraded to safety grade during the first refueling outage after restart.

GPUN's letter of March 22, 1983 (5211-83-055) describes our commitment to lock open these valves, thereby eliminating the need for upgrading the valve controls to safety grade. In addition, EFW Pump Recirculation Line Piping from the EF-V8 valves to the condensate storage tanks has been upgraded to Seismic Class 1 as described in Section III.1 of our letter of October 3, 1984 (5211-84-2244). Since EF-V8 A, B and C are required to remain locked open during normal plant operation and under postulated accident conditions they are not included in the TMI-1 Environmental Qualification Master List.

We wish to clarify that GPUN has no plans to upgrade EF-V8 A, B and C to safety grade. Any future modifications to these valves which may prove to be desirable would be accomplished in accordance with 10 CFR 50.59.

Sincerely,

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MRK/HDH/spb

cc: R. Conte D. Vito Director, TMI-1

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