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Office of Nuclear Reactor Regulation
Attn: Mr. H. Denton, Director
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Exemption from Local Leak Rate Testing (LLRT)
Schedule Requirements

As a result of delays in TMI-1's operating schedule, GPUN finds it necessary to request an exemption from licensing requirements in order to prevent a forced outage to perform tests that have been planned for the Eddy Current Outage which is now scheduled to begin in March, 1986.

In accordance with 10 CFR 50, Appendix J, Section III.D.3, TMI-1 is required to complete the first tests in the next series of Local Leak Rate Tests (LLRT) by February 23, 1986. Without prior approval of the NRC, TMI-1 Technical Specifications (T.S.) also requires the first tests to be completed by that date. Barring an unforeseen shutdown of sufficient duration, these schedule requirements cannot be met without bringing the plant to cold shutdown conditions solely for the purpose of completing LLRT by their required dates. Forced shutdowns during the Restart test sequence may require the plant to be in cold shutdown for short periods of time during which GPUN will attempt to complete as much of LLRT as possible. However, as an alternative to cooling down specifically to perform these tests, GPUN is requesting a one time exemption in accordance with 10 CFR 50.12 from Appendix J, Section III.D.3. This exemption would allow completion of those tests which we are unable to perform by their required date to be delayed until startup from the Eddy Current Outage or from any forced cold shutdown prior to the Eddy Current Outage which is recognized to be of sufficient duration. In any event, if the balance of LLRT is not completed before August 23, 1986, GPUN would shutdown in order to complete them.

This one time only exemption pertains to LLRT, Type C Tests required by 10 CFR 50, Appendix J which are intended to measure the leakage rates of containment isolation valves (CIVs). Appendix J, Section III.D.3 requires that Type C tests be performed during each reactor shutdown for refueling but

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in no case at intervals greater than 2 years. T.S. 4.4.1.2.5 requires these tests to be performed at a frequency of at least each refueling period. T.S. 1.2.8 defines a Refueling interval as "the time between normal refuelings of the reactor, not to exceed 24 months without prior approval of the NRC." It should be noted that T.S. allows for approval of this exemption without further amendment.

Type C tests for which exemption is being requested are those tests which must be performed during cold shutdown conditions. These are tests which would require test equipment to be connected inside the reactor building, affect the ability of the system to support reactor operation, or tests that would take equipment out of service that is required by T.S. for reactor operation (that is, action that would begin a T.S. time clock). Valves whose testing would fall into one or more of these three categories are listed in Table 1.

Valves CA-V4A, CA-V13, and CM-V4 are not listed in Table 1 since these valves have recently undergone post-maintenance retesting. Valves IA-V6, IA-V20, LR-V4, LR-V5, LR-V6, SA-V2 and SA-V3 can be tested during plant operation and exemption is not needed for tests of these valves.

Those valves listed in Table 1 and indicated by an asterisk are valves which have been added as part of a plant modification and do not appear in T.S. 4.4.1.2.1.b. Under license condition 2.c, TMI-1's operating license is subject to all applicable rules, regulations, and orders at the time of issuance or thereafter in effect. Therefore, Appendix J test requirements may apply to valves not specifically listed in T.S. Currently the NRC Technical Specification Improvement Project (TSIP) and the AIF Subcommittee on Technical Specification Improvements are examining the appropriateness of duplication within the technical specifications of regulation such as Appendix J and whether or not technical specifications should include detailed component lists such as the component lists included in T.S. 4.4.1.2.1. Therefore, it is appropriate to await the resolution of these issues prior to amending T.S. 4.4.1.2.1.b in order to update the valve list.

On May 29, 1985, the NRC Commissioners voted to lift the shutdown order which had remained in effect for over 6 years. In anticipation of NRC's authorization to restart, which GPUN felt was imminent, a plant heatup was conducted on June 7, 1985 and the plant remained in hot shutdown. As the restart authorization from NRC was delayed through the courts, our schedule has been pushed back in increments practically on a daily basis. During that time it became apparent that LLRT which had been scheduled to be done during the Eddy Current Outage could not be completed within the time frame allowed without performing a cooldown specifically for that purpose and discussions were held with the NRC staff concerning the exemption which we are now requesting.

The results of the last LLRT, which were submitted to the NRC on July 19, 1984, show that the "as left" leakage was less than one third the total leakage allowed by T.S. Although TMI-1 has not operated since March, 1979, in order to maintain an operational readiness for Restart during that time we

have completed four series of LLRT, which is more than would ordinarily be required over a 6-1/2 year span. From these and prior test results, GPUN has developed a historical data base from which we feel that those leakage paths which could become a problem have been identified and the necessary repair work has been accomplished with satisfactory results.

TMI-1 is presently engaged in Restart Test Program activities following the shutdown order which remained in effect for 6-1/2 years. The Restart Test Program includes zero and low power physics tests, natural circulation tests, and other tests in a slow controlled power escalation test sequence which is followed by about 90 days of operations prior to shutting down for the eddy current outage in compliance with License Amendment No. 103. We feel that to place the plant in cold shutdown only for LLRT purposes would interrupt the Restart test sequence and OTSG test run unnecessarily. It would also subject the plant to an unnecessary thermal cycle whereas we have a planned outage for eddy current testing which will occur within a reasonably short time after the original required date. Therefore, for the reasons stated above, we conclude that a limited delay in the schedule frequency requirements of the LLRT on a one time only basis as would be allowed by this exemption is justified and that in the interim, containment integrity can be assured.

In accordance with the provisions of 10 CFR 170.21, a check for $150.00 is attached as payment of the fee associated with the review of this request.

Sincerely,

H. D. Hukill
Director, TMI-1

HDH/MRK/spb:0377A

Attachment

cc: R. J. Conte, Senior Resident Inspector, NRC
J. Thoma, Operating Reactors Branch No. 4
T. E. Murley, Region I, Regional Administrator

TABLE 1

Containment Isolation Valves - Exemption from Appendix J
Type C Test Schedule

Depending upon the plant operating schedule, the valves listed below may require exemption from Appendix J test schedule requirements in order that they be tested during the planned outage:

Valve No.	Size (in.)	Last Date Tested
1. CA-V1	1	03/15/84
2. CA-V2	1	03/15/84
3. CA-V3	1	03/15/84
4. CA-V4B	1	02/27/84
5. CA-V5A	1	02/29/84
6. CA-V5B	1	03/01/84
7. CA-V189	2	03/26/84
8. CA-V192	2	03/26/84
9. CF-V2A	1	03/16/84
10. CF-V2B	1	03/15/84
11. CF-V12A	1	03/16/84
12. CF-V12B	1	03/15/84
13. CF-V19A	1	03/17/84
14. CF-V19B	1	03/17/84
15. CF-V20A	1	03/16/84
16. CF-V20B	1	03/15/84
17. CM-V1	1	02/23/84
18. CM-V2	1	02/23/84
19. CM-V3	1	02/23/84
20. DH-V64	2	03/04/84
21. DH-V69	2	03/02/84
22. HM-V1A*	0.5	03/20/84
23. HM-V1B*	0.5	03/18/84
24. HM-V2A*	0.5	03/20/84
25. HM-V2B*	0.5	03/18/84
26. HM-V3A*	0.5	03/20/84
27. HM-V3B*	0.5	03/18/84
28. HM-V4A*	0.5	03/20/84
29. HM-V4B*	0.5	03/18/84
30. HP-V1	6	03/23/84
31. HP-V6	6	03/23/84
32. HR-V2A	2	03/19/84
33. HR-V2B	2	03/19/84
34. HR-V4A	2	03/19/84
35. HR-V4B	2	03/19/84
36. HR-V22A	2	03/19/84
37. HR-V22B	2	03/19/84
38. HR-V23A	2	03/18/84
39. HR-V23B	2	03/18/84

Valve No.	Size (in.)	Last Date Tested
40. IC-V2	6	03/09/84
41. IC-V3	6	05/13/84
42. IC-V4	6	03/10/84
43. IC-V6	3	03/11/84
44. IC-V16	4	03/11/84
45. IC-V18	6	03/10/84
46. LR-V1	6	03/23/84
47. LR-V10	6	03/23/84
48. LR-V49	6	03/23/84
49. MU-V2A	2.5	04/07/84
50. MU-V2B	2.5	04/07/84
51. MU-V3	2.5	04/07/84
52. MU-V18	2.5	03/29/84
53. MU-V20	4	03/13/84
54. MU-V25	4	03/14/84
55. MU-V26	6	03/14/84
56. MU-V116	1.5	03/13/84
57. NI-V26*	1	03/25/84
58. NI-V27	1	03/25/84
59. NS-V4	1.5	03/13/84
60. NS-V11	8	03/12/84
61. NS-V15	8	03/12/84
62. NS-V35	8	03/13/84
63. RB-V2A	8	03/27/84
64. RB-V7	8	03/22/84
65. SF-V23	8	03/25/84
66. WDG-V3	2	03/11/84
67. WDG-V4	2	03/11/84
68. WDL-V303	4	03/17/84
69. WDL-V304	4	03/17/84
70. WDL-V534	8	03/24/84
71. WDL-V535	8	03/24/84

*Valves which are required to be tested in accordance with 10 CFR 50 Appendix J but are not listed in T.S. 4.4.1.2.1.6.