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U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Heat Sink Protection System (HSPS)-  
Operational Bypass Capability

The purpose of this letter is to followup on a commitment from our letter dated January 23, 1987 which forwarded Technical Specification Change Request (TSCR) No. 166 and inform the NRC that an operational bypass of the HSPS low OTSG level initiation of Emergency Feedwater (EFW) will not be needed for future cycles. GPUN does not feel that it is necessary to reconfigure the HSPS to provide for this bypass capability. Nor do we intend to request an extension of the provisions of Technical Specification (T.S.) 3.5.1.1 which expire subsequent to Cycle 6 operation.

Specifically, T.S. Table 3.5.1.D, footnote (c) permits the operator to disable the HSPS automatic initiation of Emergency Feedwater (EFW) on low OTSG level when indicated reactor power is less than 30% during normal reactor startup or shutdown. T.S. Amendment 124 grants this provision for one cycle of operation to allow sufficient operating experience with the new system and prevent inadvertent EFW initiations in the event that the new system were to demonstrate unacceptable OTSG level oscillations during low power operation.

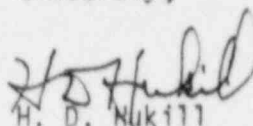
The design of the HSPS did not require provisions for an operational bypass of the low OTSG level EFW initiation feature because bypass of this feature was not anticipated. Since we did not expect the system to require this bypass capability, GPUN did not discuss the need for this provision with the NRC until our submittal of TSCR 166.

Prior to HSPS startup test and operation, other plants were experiencing inadvertent EFW initiations as a result of level oscillations at low power. Our system was different from the plants that were experiencing problems; however, we did not wish to experience the inadvertent EFW initiations that might result if level oscillations under actual low power operating conditions were to become a problem.

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Currently as a result of our experience with the HSPS during Cycle 6 operation, including the five startups during Cycle 6, we feel that we have gained sufficient confidence in the stability of OTSG level control during low power operation. Therefore, bypass of HSPS EFW automatic initiation on low OTSG level during low power operation will not be needed for future cycles of operation.

Sincerely,



H. D. Nukill

Vice President & Director, TMI-1

HDH/MRx./spb:0764A

cc: J. Stolz  
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