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May 4, 1988
C311-88-2056

US 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
Technical Specification Change Request No. 185

In accordance with 10 CFR 50.4 (b)(1), enclosed is one (1) original, and in addition ten (10) conformed copies of Technical Specification Change Request No. 185.

Also enclosed is one signed copy of the Certificate of Service for this request to the chief executives of the township and county in which the facility is located, as well as the Bureau of Radiation Protection.

Pursuant to 10 CFR 50.91(a)(1), we enclose our analyses, using the standards in 10 CFR 50.92 of significant hazards considerations. As stated above, pursuant to 10 CFR 50.91(a) of the regulations, we have provided a copy of this letter, the proposed change in Technical Specifications, and our analyses of significant hazards considerations to Thomas Gerusky, the designated representative of the Commonwealth of Pennsylvania.

Pursuant to the provisions of 10 CFR 170.21, enclosed is a check for $150.00 as payment of the fee associated with Technical Specification Change Request No. 185.

Sincerely,

H. D. Hukill
Vice President & Director, TMI-1

HDH/MRK/spb

Enclosures: 1) Technical Specification Change Request No. 185
2) Certificate of Service for Technical Specification Change Request No. 185
3) Check No. 314320

A017 1/1 w/check $150 # 314320

cc: J. Stolz, R. Hernan, W. Russell, R. Conte

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 185

GPUN requests that the attached revised pages replace pages 4-32 and 4-33 of the TMI-1 Technical Specifications.

II. REASON FOR CHANGE

The piping configuration inside and outside of Containment Penetration No. 417 is being modified. This modification will result in a more ideal containment barrier in that blind flanges and a spectacle flange will replace the current configuration utilizing valves. As a result of this modification, two valves (LR-V1 and LR-V49) will no longer be containment isolation valves and can be eliminated from the Local Leakage Rate Test (LLRT) program. On completion of the modification, a spectacle flange and a blind flange will be added to the test program.

On completion of this modification, 10 CFR 50 Appendix J LLRT requirements will be applicable to the new piping configuration even in the absence of any changes to the current technical specifications. This modification will not however result in a configuration such that the current technical specification test requirements can not be met.

This change only revises the listing of components subject to 10 CFR 50 Appendix J, type "B" and type "C" LLRT requirements. This change is needed to reflect the addition of the new spectacle flange and blind flange to the Type "B" test program and to permit deleting valves LR-V1 and LR-V49 from the Type "C" test program.

III. SAFETY EVALUATION JUSTIFYING THE CHANGE

The modification of containment penetration no. 417 will result in a piping configuration which meets 10 CFR 50 Appendix A (General Design Criteria) Criterion 56. The new piping configuration inside containment will consist of a single 6" blind flange. The two leakage paths outside containment will consist of 1) a single 6" spectacle flange and 2) a 1" test connection valve in series with a blind flange.

This modification will result in a more ideal containment barrier in that blind/spectacle flanges will be added to the penetration piping configuration. Blind flanges and spectacle flanges provide a superior leak tight seal to that of the leakage protection provided by valves.

This change is administrative in nature in that it will revise the LLRT type "B" and type "C" test requirements of TMI-1 Technical Specification Section 4.4.1.2.1 to match the 10 CFR 50 Appendix J, type "B" and type "C" test requirements. LLRT type "B" tests measure the leakage rates of resilient seals, gaskets, sealant compounds, etc. (flanges, airlocks, and other seals). On completion of the modification to containment penetration no. 417, type "B" tests will be required for the spectacle and blind flange that will become part of the containment penetration boundary. Therefore, the addition of these flanges to the technical specification listing will not affect the test requirements because these tests will be required by NRC regulation regardless of the technical specification listing. The addition of these components to the list provided in section 4.4.1.2.1.a will only bring the technical specification list up to date to show these components.

The purpose of LLRT type "C" tests is to measure the leakage rates of piping bounded by containment isolation valves and block valves. On completion of the modification to containment penetration no. 417, valves LR-V1 and LR-V49 will remain within the piping configuration. The new piping configuration will not prohibit performing type "C" tests of LR-V1 and LR-V49 in accordance with Technical Specification 4.4.1.2.1.b, however these tests will not be required by 10 CFR 50 Appendix J because LR-V1 and LR-V49 will no longer serve the function of a containment isolation valve. Therefore, LLRT type "C" test requirements for LR-V1 and LR-V49 can be deleted.

IV. NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPUN has determined that this Technical Specification Change Request poses no significant hazards as defined by the NRC in 10 CFR 50.92. This change is considered to be administrative in nature and does not involve significant hazards consideration as evaluated below.

1. Operation of Three Mile Island Nuclear Station, Unit-1, in accordance with this change would not involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed Technical Specification change does not modify or create any accident initiating condition. This change only provides an update of the list of components subject to 10 CFR 50 Appendix J Type "B" tests to add additional

components to the list and deletes the Type "C" test requirements for two valves that will no longer serve the function of a containment isolation valve. (10 CFR 50.92(c)(1))

2. Operation of Three Mile Island Nuclear Station, Unit-1, in accordance with this change would not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed Technical Specification change does not modify or create any accident initiating condition. The piping configuration that will result from the modification to penetration No. 417 meets Criterion 56 of the General Design Criteria, 10 CFR 50 Appendix A. The proposed changes to the LLRT test requirements in Technical Specification 4.4.1.2.1 will result in technical specification requirements that match the requirements of 10 CFR 50 Appendix J. (10 CFR 50.92(c)(2))

3. Operation of Three Mile Island Nuclear Station, Unit-1, in accordance with this change would not involve a significant reduction in a margin of safety because all Updated Final Safety Analysis Report (USAR) assumptions remain unchanged. The proposed changes to the LLRT test requirements in Technical Specification 4.4.1.2.1 will result in technical specification requirements that match the requirements of 10 CFR 50 Appendix J.The modification to penetration No. 417 will improve the leakage protection capability of this penetration. (10 CFR 50.92(c)(3))

The Commission has provided guidelines pertaining to the application of the three standards by listing specific examples in the Federal Register (48 FR 14870). This proposed change is considered to be in the same category as example (i) of the "Amendments Not Likely to Involve Significant Hazards Consideration" from that listing. Thus,operation of the facility in accordance with the proposed amendment involves no significant hazards considerations.

V. IMPLEMENTATION

It is requested that the amendment authorizing this change become effective upon issuance and shall be implemented within thirty days of receipt.

VI. AMENDMENT FEE (10 CFR 170.21)

Pursuant to the provisions of 10 CFR 170.21, enclosed is a check for $150.00 as payment of the fee associated with Technical Specification Change Request No. 185.