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October 19, 1998

1920-98-20183

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

Gentlemen:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Technical Specification Change Request No. 248 - Remote Shutdown System

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 248.

The purpose of this TSCR is to revise the TMI-1 Technical Specifications to add operability and surveillance requirements for the remote shutdown system similar to those in NUREG-1430, "Standard Technical Specifications - Babcock and Wilcox Plants", Section 3.3.18 entitled "Remote Shutdown System".

Using the standards in 10 CFR 50.92, GPU Nuclear has concluded that these proposed changes do not constitute a significant hazards consideration, as described in the enclosed analysis performed in accordance with 10 CFR 50.91(a)(1). Also enclosed is the Certificate of Service for this request certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection.

Sincerely,

James W. Langenbach  
Vice President and Director, TMI

/DJJ

- Encl. (1) TMI-1 TSCR No. 248 Safety Evaluation, No Significant Hazards Consideration, Technical Specification Revised Pages.  
(2) Certificate of Service for TMI-1 TSCR No. 248

cc: Administrator, Region I  
TMI Senior Resident Inspector  
TMI-1 Senior Project Manager

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**ENCLOSURE 1**

**TMI-1 Technical Specification Change Request No. 248 Safety Evaluation**

**No Significant Hazards Consideration and**

**Proposed Technical Specification Revised Pages**



I. Technical Specification Change Request No. 248

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications:

- Revised Technical Specification Pages: ii, vi, 4-2, 4-2a

GPU Nuclear requests that the following new pages be inserted into existing Technical Specifications:

- Add Technical Specification Pages: 3-40g, 3-40h, 3-40i, 3-40j

These pages are attached to this enclosure.

II. Reason for Change

The purpose of this Technical Specification Change Request is to revise the TMI-1 Technical Specifications to add operability and surveillance requirements for the remote shutdown system similar to those in NUREG-1430, "Standard Technical Specifications - Babcock and Wilcox Plants," Section 3.3.18 entitled "Remote Shutdown Systems".

III. Safety Evaluation Justifying Change

The proposed revision to the TMI-1 Technical Specifications adds operability and surveillance requirements to the Technical Specifications for the remote shutdown system functions similar to those in NUREG-1430, "Standard Technical Specifications - Babcock Wilcox Plants", Section 3.3.18 entitled "Remote Shutdown Systems." Incorporation of these requirements into the TMI-1 Technical Specifications was requested by NRC letter dated December 27, 1994. The remote shutdown system meets the NRC Policy Statement as a risk significant item for retention in the Technical Specifications and therefore is being added to the TMI-1 Technical Specifications.

Surveillance of the instrumentation and controls associated with the TMI-1 remote shutdown system functions listed in the proposed Technical Specification change will continue to be implemented in accordance with the existing TMI-1 Fire Protection Program Administrative Procedure (AP) 1038, and associated surveillance procedures. These existing controls currently envelope the proposed Technical Specification requirements with the exception of the proposed specification requirement for plant shutdown if a required function is not restored to operable status within 30 days. Procedure AP-1038 will be revised to incorporate the proposed Technical Specification requirements, where applicable.

Proposed Technical Specification Section 3.5.7, Remote Shutdown System, incorporates the applicability requirements, limiting conditions of operation, operability requirements, required actions and completion times, and Bases. Proposed Technical Specification Section 4.1.4 incorporates the remote shutdown system surveillance requirements. The proposed Technical Specification changes are consistent with the NRC Standard Technical Specification (NUREG-1430) requirements for remote shutdown system. The proposed revision to existing Technical Specification page 4-2a is only to accommodate repagination from page 4-2 as a result of the text added to page 4-2. This change to page 4-2a is only editorial. Therefore, the proposed change provides additional assurance of operability of the TMI-1 remote shutdown system functions in the event that operators must place and maintain the unit in a safe shutdown condition from outside the control room.

#### IV. No Significant Hazards Consideration

GPU Nuclear has determined that this Technical Specification Change Request poses no significant hazards consideration as defined by 10 CFR 50.92.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated. The proposed amendment adds operability and surveillance requirements for the existing TMI-1 remote shutdown system similar to those contained in NRC NUREG-1430, "Standard Technical Specifications - Babcock & Wilcox Plants". The addition of these requirements to Technical Specifications provides further assurance of remote shutdown system operability in the event that operators must place and maintain the unit in a safe shutdown condition from outside the control room. The function and operation of the remote shutdown system has not changed. Therefore, this activity has no effect on the probability of occurrence or consequences of an accident previously evaluated.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any previously evaluated. The proposed amendment has no impact on any plant structures, systems or components. The function and operation of the remote shutdown system has not changed. Therefore, this activity does not create the possibility of a new or different kind of accident from any previously evaluated.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety. The proposed amendment provides additional assurance of remote shutdown system operability. The function and operation of the remote shutdown system has not changed. Therefore, this activity does not reduce the margin of safety.

#### V. Implementation

GPU Nuclear requests that the amendment authorizing this change become effective thirty (30) days after issuance.