

SAFETY EVALUATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
FOR RECOVERY OPERATIONS PLAN CHANGE REQUEST 35

INTRODUCTION

By letter dated December 16, 1985, the licensee requested approval for modifications to the TMI-2 Recovery Operations Plan (ROP). This request was supplemented in a discussion with the licensee's staff held on March 27, 1986. These changes involve revisions to Tables 4.3-1 and 4.3-7 of the ROP, as discussed below.

EVALUATION

The licensee proposes to make several changes to Table 4.3-1, to correct administrative errors arising from NRC ROP Change No. 31, issued October 21, 1985 (GPUNC ROP Change Request No. 29). In ROP Change No. 31, the neutron monitoring instrumentation surveillance requirements were listed solely in Table 4.3-1; previously, some requirements were also specified in Table 4.3-7. Consolidating the requirements resulted in some administrative errors to Table 4.3-1. The current request corrects these errors by making the following changes to Table 4.3-1:

- 1) The addition of a note which states "Intermediate and Source Range and Rate is not required at Cabinet 217."
- 2) Changing the frequency of channel checks from once per 12 hours to monthly for Cabinet 217, with a note to that effect. The channel check frequency will remain once per 12 hours for the control room readout channels.

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The first change is necessary because prior to ROP Change No. 31, Table 4.3-7 specified the surveillance requirements for the Intermediate and Source Range Neutron Flux level monitors, including the readout locations in the control room and at Cabinet 217. Table 4.3-1 also specified surveillance requirements for the neutron flux level monitors, and, additionally, the neutron flux rate monitors; however, this table did not identify readout locations. In ROP Change No. 31, Table 4.3-1 was revised to include the neutron flux level monitor readout locations previously listed in Table 4.3-7, however, the neutron flux rate monitors were incorrectly identified as having readout capability at Cabinet 217. This oversight will be corrected by the proposed change.

The second correction to Table 4.3-1 is related to the first. Prior to ROP Change No. 31, Table 4.3-7 required monthly channel checks for the neutron flux level monitors at the control room and Cabinet 217 readout locations. Table 4.3-1 required channel checks every 12 hours for the neutron flux level and rate monitors at the control room readout locations only. The proposed change will restore the monthly channel check frequency for the neutron flux level monitoring instrumentation in Cabinet 217. This frequency is consistent with the original intent of the requirement and will minimize the wear and tear on the equipment in Cabinet 217. The channel check frequency will remain at once per 12 hours for the neutron monitoring instrumentation control room readout locations. These two changes are administrative in nature and will correct discrepancies found in an earlier revision to the ROP, therefore the staff finds them acceptable.

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The licensee also proposes to modify Table 4.3-7 by adding an alternate readout location for Reactor Building Water Level indication. The licensee has installed this alternate level indication, consisting of a probe and level indicating transmitter with readout in the Hot Instrument Shop. The proposed change will improve Reactor Building Water Level monitoring reliability by providing an additional capability for surveillance, thus allowing greater operational flexibility.

The staff concludes that the proposed changes to the ROP do not pose a significant risk to the health and safety of the public and that the proposed changes are within the scope of activities and events analyzed in the PEIS. We therefore approve the proposed changes to the TMI-2 Recovery Operations Plan as discussed herein. Our approval of GPU ROP Change Request No. 35 is NRC ROP Change Approval No. 32.

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Enclosure

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following pages of the TMI-2 Recovery Operations Plan with the enclosed pages as indicated:

4.3-2

4.3-10

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TABLE 4.3-1  
NEUTRON MONITORING INSTRUMENTATION

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	READ OUT LOCATIONS
1. Intermediate Range, Neutron Flux Rate	S/M <sup>(4)</sup>	R <sup>(1)</sup>	M	2	0	1	Cab 217 + <sup>(2&amp;3)</sup> Control Room
2. Source Range, Neutron Flux and Rate	S/M <sup>(4)</sup>	R <sup>(1)</sup>	M	2	0	2	Cab 217 + <sup>(2&amp;3)</sup> Control Room

NOTES

- 1) Neutron detectors and all channel components located inside containment may be excluded from CHANNEL CALIBRATION.
- 2) Only one readout required at Cabinet 217.
- 3) Intermediate and Source Range is not required at Cabinet 217.
- 4) Monthly channel check applies only to Cabinet 217.

TABLE 4.3-7

ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT	CHANNEL CHECK	CHANNEL <sup>(1)</sup> CALIBRATION	READOUT LOCATION(S)	MINIMUM OPERABLE CHANNELS
1. Reactor Building Pressure	S	R	Control Room	2
2. Reactor Vessel Water Level	S/W <sup>(2)</sup>	SA	Control Room(2)	2 <sup>(2)</sup>
3. Incore Thermocouples/RCS Temperature Detectors	S	R	Control Room or Cable Room	2 <sup>(3)</sup>
4. Reactor Building Water Level	NA	SA	Control Bldg. Area West or Hot Instrument Shop	1
5. Borated Water Storage Tank Level	S	R	Control Room	1
6. Steam Generator Level	NA	NA	NA	1/Generator
7. Spent Fuel Storage Pool "A" Water Level	S/W <sup>(2)</sup>	SA	Control Room <sup>(2)</sup> or Fuel Handling Bldg.	2 <sup>(2)</sup>
8. Fuel Transfer Canal (deep end) Water Level	S/W <sup>(2)</sup>	SA	Control Room or Reactor Bldg.	2 <sup>(2)</sup>

(See following page for notes)

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