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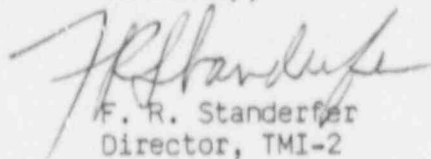
US Nuclear Regulatory Commission
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Dear Sirs:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Post-Defueling Monitored Storage Safety Analysis Report
Amendment 1

Attached is Amendment 1 to the Post-Defueling Monitored Storage (PDMS) Safety Analysis Report (SAR). This amendment provides the basis for the GPU Nuclear-calculated person-rem savings for decommissioning following 20 years of PDMS.

Sincerely,



F. R. Standerfer
Director, TMI-2

EDS/emf

Attachment

cc: R. J. Conte - Senior Resident Inspector, TMI
W. T. Russell - Regional Administrator, Region 1
J. F. Stolz - Director, Plant Directorate IV
L. H. Thonus - Project Manager, TMI Site

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1A.7.3 ACTIVITIES DURING PDMS

Work performed in radiation areas during PDMS includes maintenance in the Reactor Building and in the AFHB, surveys and inspections in these facilities and radioactive waste processing.

1A.8 JOB-HOUR ESTIMATES

The most comprehensive study pertaining to the work scope and approach for decontamination activities is the DTFR which defines decontamination tasks necessary to achieve the Phase III endpoint criteria, along with the associated job-hours required to complete these tasks. The information presented in Reference 2, categorized by Reactor Building and AFHB activities, assumes 3 years to complete the decontamination tasks.

The DTFR is used as the basis for the job-hour estimates for this present evaluation as many of the tasks specified in the report will also be required for future decontamination. However, the total number of hours required to reach the base case criteria from current or Phase III endpoint conditions will differ from those listed in the DTFR, and no time dependence is assumed for reducing the dose rates to the base case criteria. In addition, the hours developed in the report were initially used for budget purposes and hence were billable hours (i.e., total hours committed) rather than an estimate of the actual hours spent in a radiation field. Therefore, the job-hour estimates in the DTFR were modified for this evaluation. This modification considers:

- The difference in scope between the DTFR estimates and the Post-Phase III required additional decontamination; and
- The fraction of the total job-hours that will be spent in radiation areas.

Table 1A-7 lists the estimated job-hours that will be spent in radiation fields, using the categories in the DTFR, with the DTFR total job-hours included for comparison. The radiation area job-hours are given for three cases: 1) immediate additional decontamination following Phase III; 2) final decontamination as a part of decommissioning following 20 years of PDMS (the Reference 1 base case); and 3) final decontamination as a part of decommissioning following 30 years of PDMS (the base case assumed in this SAR). These categories were expanded for this evaluation, as shown in Table 1A-5. The job-hours assumed for each of these categories are also listed. Previous history has shown that person-rem attributable to health physics support is a percentage of total person-rem, therefore no job-hours are listed for this task.

1A.8.1 SCOPE MODIFICATIONS

Identified modifications to the work scope are used to estimate the change in total job-hours based on a change in the desired endpoint of the tasks or a change in the decontamination program starting point.

TABLE 1A-7

RADIATION AREA JOB-HOURS

TASK DESCRIPTION	DTFR ¹ TOTAL JOB-HOURS	RADIATION AREA JOB-HOURS ²		
		Post-Phase III	Post-PDMS	
			20-Year PDMS	30-Year PDMS
1. RB Characterization	6,400	1,280	1,280	1,280
2. RB Visual Survey	21,060	421	421	421
3. Sludge & Core Bore Visual	13,330	200	20	20
4. RB Decon/Dose Reduction	24,320	4,864	3,405	2,432
5. RB Decon Maintenance	69,680	13,936	9,755	6,968
6. Desludge RB Basement	63,650	9,548	9,548	9,548
7. Decon D Rings Above 282'	37,120	14,848	12,992	11,136
8. RB Basement Recovery	114,610	51,575	42,979	34,383
9. Establish HVAC Control	104,250	0	0	0
10. Decon 347' and above	190,320	38,064	26,645	19,032
11. Decon 305' and above	190,320	38,064	26,645	19,032
12. Robotics	22,880	0	0	0
13. Non RCS Systems Decon	119,600	2,392	2,392	2,392
14. RCS System Decon	13,360	267	267	267
15. Site Engineering	76,190	3,810	3,810	3,810
SUBTOTAL	1,067,090	179,268	140,158	110,720
AFHB				
1. AFHB Characterization	45,760	686	686	686
2. Decon Maintenance	109,200	2,730	1,538	546
3. Tech Spec	106,080	0	0	0
Decontamination				
4. AFHB Cubicle Decon	291,200	14,560	10,192	7,280
5. Systems Characterization	27,040	406	243	81
6. Non RCS Systems Decon	239,200	2,392	1,196	239
7. Site Engineering	55,640	139	28	28
SUBTOTAL	874,120	20,913	13,984	8,861
TOTAL	1,941,210	200,181	154,141	119,581

NOTES:

1. DTFR - Decontamination Task Force Report
2. Post-Phase III - Immediate additional decontamination
Post-PDMS - Final Decontamination as a part of decommissioning