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September 19, 1997

6710-97-2424

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

Gentlemen:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Docket No. 50-289
Operating License No. DPR-50
Supplement to License Amendment Request No. 269 –
Revised Steam Line Break Accident Analysis Dose Consequence

This letter provides a supplement to TMI-1 License Amendment Request No. 269 previously submitted to the NRC on August 14, 1997 (6710-97-2345). As discussed in GPU Nuclear/NRC conference calls on September 16 and 17, 1997, this supplement includes an additional change to TMI-1 Technical Specification Section 3.1.4 to provide a more restrictive limit of 0.35 microcurie/gram dose equivalent Iodine-131 for reactor coolant system (RCS) activity level during plant operation. The dose consequences associated with License Amendment Request No. 269 are based on the existing Technical Specification limit of 1.0 microcurie/gram dose equivalent Iodine-131. Therefore, this more restrictive limit on RCS activity level provides an additional conservatism in the dose consequences associated with License Amendment Request No. 269. This additional conservatism is provided to account for uncertainties identified by NRC in the flashing fraction and atmospheric diffusion values utilized by GPU Nuclear in the analysis supporting License Amendment Request No. 269. Accounting for NRC uncertainties by implementing a more restrictive RCS activity level ensures that the dose consequences resulting from the postulated accident induced once-through steam generator (OTSG) tube leakage described in License Amendment Request No. 269 remain conservative and result in values which are a small fraction of the 10 CFR 100 limits.

The revision of the Technical Specification limit on RCS dose equivalent iodine activity level from 1.0 microcurie/gram to 0.35 microcurie/gram is considered an administrative change since it implements a more restrictive, conservative operational limit. Therefore, this additional change to the TMI-1 License Amendment Request No. 269 does not affect the safety evaluation justifying the proposed license amendment and does not change any of the conclusions supporting the no significant hazards discussion or environmental consideration provided in the License Amendment Request No. 269 submittal referenced above. An additional editorial

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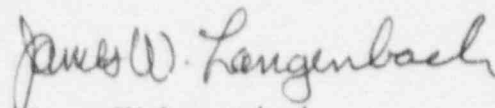
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clarification to the previously proposed revision to TMI-1 Updated Final Safety Analysis Report (UFSAR), page 14.1-32, originally submitted in License Amendment Request No. 269, is included in Enclosure I. This proposed UFSAR page revision clarifies that the UFSAR analysis performed using 1.0 microcurie/gram dose equivalent iodine is more conservative than the Technical Specification 3.1.4 limit. The revised TMI-1 Technical Specification and UFSAR pages are included in Enclosure I and are to be included as a supplement to TMI-1 License Amendment Request No. 269.

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.

GPU Nuclear plans to provide the data and analyses in the next 3-6 months to support the flashing factor and atmospheric diffusion model values to justify a less restrictive RCS activity level.

Sincerely,



James W. Langenbach

Vice President and Director, TMI

DJD

Enclosures: (1) Supplemental TMI-1 Technical Specification/UFSAR Revised Pages
(2) Certificate of Service for Supplement to TMI-1 License Amendment Request No. 269

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

