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Writer's Direct Dial Number:

September 15, 1987 5211-87-2166

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

Gentlemen:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 175

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. 175.

The proposed amendment incorporates appropriate surveillance and operability requirements for post-accident monitoring instrumentation installed to satisfy Regulatory Guide 1.97, Revision 3, Category I indication requirements. Two (2) Regulatory Guide 1.97 Category I variables for TMI-1, Coolant Inventory and Containment Isolation Valve Position, are not included in the proposed amendment on the basis that these two variables do not meet the criteria delineated in NRC Proposed Policy Statement on Technical Specification Improvements for Nuclear Power Reactors, issued February 6, 1987, for determining the required scope of Technical Specifications. These variables, (1) are not relied upon to detect or indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary, (2) are not process variables that are an initial condition of a Design Basis Accident or Transient Analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier, and (3) are not a structure, system or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. This position is consistent with the B&W Owner's Group Technical Specification Committee's Standard Technical Specification Disposition Matrix.

Also enclosed is one signed copy of the Certification 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.

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September 15, 1987 -2-5211-87-2166 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. 175. Sincerely. Vice President and Director, TMI-1 HDH/DJD:jh 5082g/0067T cc: J. Stolz, USNRC W. Russell, USNRC Region I G. Edison, USNRC R. Conte, USNRC, TMI-1 Site Enclosures: 1) Technical Specification Change Request No. 175 2) Certification of Service for Technical Specification Change Request No. 175 3) Check No. 287538

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NO. 50-289 LICENSE NO. DPR-50

GPU NUCLEAR CORPORATION

This is to certify that a copy of Technical Specification Change Request No. 175 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with executives of Londonderry Township, Dauphin County, Pennsylvania; Dauphin County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Jay H. Kopp, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Mr. Thomas Gerusky, Director PA. Dept. of Environmental Resources Bureau of Radiation Protection P.O. Box 2063 Harrisburg, PA 17120 Mr. Frederick S. Rice, Chairman Board of County Commissioners of Dauphin County Dauphin County Courthouse Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY:

The President & Director, TMI-T

DATE: September 15, 1987