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August 30, 1989
C311-89-2073

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

Dear Sir:

Three Mile Island Nuclear Station, Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Scope of TMI-1 Condition of Operation 1 (b)

By letter C311-89-2001, GPUN provided a status of the TMI-1 Conditions of Operation. The conditions were imposed in the letter from Mr. H. Denton dated October 2, 1985. Because of waste handling activities planned, we are submitting this letter to document our understanding of the scope of Condition of Operation 1(b). Condition 1(b) reads:

Unit 1 solid waste handling capabilities shall not be relied upon for decontamination or restoration of Unit 2. LBP-81-59, 14 NRC 1211, 1454 (1981); LBP-82-27, 15 NRC at 757.

Our letter of C311-89-2001 reported the status of the condition to be:

This condition has been satisfied. Unit 1 solid waste handling capabilities have not been relied upon for Unit 2 activities.

The following discussion represents GPUN's understanding of the origin of the Condition. During the TMI-1 Restart proceedings, the Atomic Safety and Licensing Board (ALSB) reviewed the adequacy of the liquid, gaseous, and solid waste handling systems at Unit 2 to process Unit 2 wastes without depending upon Unit 1 systems. The board concluded that the liquid and gaseous treatment/handling capabilities for TMI-2 were adequate. However, at the time of the Proceedings, the method of packaging TMI-2 EPICOR II and Submerged Demineralizer System (SDS) filters and resins had not been determined. Specifically, GPUN had not yet determined whether or not this waste had to be solidified for shipment and burial. At that time, TMI-2 did not have the capability to solidify these wastes and although GPUN committed to installing a separate solidification system for TMI-2, if needed, the Board decided to impose "... a condition of restart that Unit 1 solid waste handling capabilities will not be relied upon for decontamination or restoration of Unit 2."

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At present, TMI-2 has disposed of the majority of the existing EPICOR II and SDS filter and resin wastes. In addition, wastes from systems designed and installed since the Restart Proceedings (Defueling Water Cleanup System and the Sludge Processing System) have also been generated, processed, and have or are being disposed of. All wastes were processed without dependence on any TMI-1 solid waste treatment systems. Therefore, GPUN has assured and demonstrated independence of solid waste handling. The NRC has confirmed our compliance with this condition in a number of TMI-1 Inspection Reports (IR 82-03, 82-21, 84-33 and 85-17).

Much of the solid waste handling associated with the cleanup of TMI-2 has been completed and little remains in the future. The SDS has been removed from service. The SDS Leakage Containment System, however, will remain operational until all depleted SDS vessels are removed from the pool. The Defueling Water Cleanup System (DWCS) will remain operable during and for a short while after defueling. The Sludge Processing System will remain operable until TMI-2 enters Mode 4 of Post Defueling Monitored Storage (PDMS). EPICOR II will remain operable during Mode 4. The future management of waste material is as described in the TMI-2 PDMS Safety Analysis Report submitted by our letter of August 16, 1988 (4410-88-L-0068/0378P) (Section 7.2.3). As has occurred since 1979, water treatment system containers will be prepared for disposal by TMI-2 facilities or vendor equipment and shipped offsite.

A new system, separate from any TMI-1 system, is being developed to evaporate TMI-2 accident generated water. Present plans call for preparing the evaporator bottoms for disposal by a TMI-2 system. This approach is being reviewed by the NRC. The NRC will have continuing approval of procedures associated with this new system per TMI-2 Recovery Tech. Specs., Section 3.9.13.

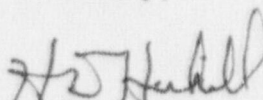
Since the TMI-2 accident, GPUN has applied Condition 1(b) in a very conservative manner by not allowing TMI-2 waste materials into TMI-1. For reasons based on the content of this letter, the management of contaminated materials will change resulting in certain TMI-2 contaminated material intermingling with TMI-1 material. The TMI-2 material consists of small volumes including residual amounts of liquid and solids. The Restart Proceedings did not address movement of these types of materials. Therefore, we do not believe that condition 1(b) was meant to restrict such activities. These actions will be taken to consolidate resources (both manpower and equipment) at the TMI site. Examples of these activities are:

- 1) Samples from TMI-2 will be analyzed in TMI-1 laboratories and then processed through Unit 1 radwaste systems.
- 2) Tools, components, instruments, rad meters, etc. from TMI-2 having residual contamination will be used in TMI-1 and decontaminated as needed, in the appropriate facilities. These tools may go back and forth on a routine basis depending upon needs.

- 3) To achieve optimum waste packaging for shipment offsite wastes may be intermixed. For example, resins, sludges, and filter material from TMI-1 and TMI-2 may be placed in a common container and processed. This will minimize the shipment of containers and minimize on-site storage periods. Other materials such as Dry Active Waste (DAW) and Noncompactable materials will be processed in a similar manner. Full compliance with NRC, DOT and burial requirements will be maintained (10CFR20.311, 10CFR61, 10CFR70, 10CFR71 and 49CFR). This most likely will result in having only one DAW trash compactor or waste packaging facility on the TMI site.
- 4) Materials will be moved between plants to undergo decontamination. Ultimately, this would lead to one operational decontamination facility on the TMI site, which would be located at either Unit 1 or 2.

If any of the information presented is contrary to your understanding, please advise us within thirty days of this letter. Otherwise, we plan to proceed with activities such as those noted in the examples under the assumption that our understanding of the Condition of Operation 1(b3 is consistent with yours.

Sincerely,



H. D. Hukill

Vice President & Director, TMI-1

HDH/WGH/ag:2073

cc: R. Hernan
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