



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

December 3, 2020

Mr. Bryan C. Hanson  
Senior Vice President  
Exelon Generation Company, LLC  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 – ISSUANCE OF AMENDMENT NO. 300 RE: DELETION OF PERMANENTLY DEFUELED TECHNICAL SPECIFICATION 3/4.1.4, “HANDLING OF IRRADIATED FUEL WITH FUEL HANDLING BUILDING CRANE” (EPID L-2019-LLA-0250)

Dear Mr. Hanson:

The U.S. Nuclear Regulatory Commission (the Commission) has issued the enclosed Amendment No. 300 to Renewed Facility License No. DPR-50 for the Three Mile Island Nuclear Station, Unit 1 (TMI-1), in response to your application dated November 12, 2019, as supplemented by letter dated July 8, 2020 (Agencywide Document Management System Accession Numbers ML19316C659 and ML20190A108, respectively).

The amendment deletes Permanently Defueled Technical Specification 3/4.1.4, “Handling of Irradiated Fuel with Fuel Handling Building Crane,” in its entirety. The amendment also corrects the list of figures to include Figure 5-1, “Extended Plot Plan,” and adds the proper page number to Figure 5-1.

A copy of our related safety evaluation is also enclosed. Notice of Issuance will be included in the Commission’s next monthly *Federal Register* notice.

Sincerely,

A handwritten signature in cursive script, appearing to read "Theodore Smith".

Theodore Smith, Project Manager  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium  
Recover, and Waste Program  
Office of Nuclear Material Safety and  
Safeguards

Docket No. 50-289

Enclosures:

1. Amendment No. 300 to DPR-50
2. Safety Evaluation

B. Hanson

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cc: Listserv

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 – ISSUANCE OF AMENDMENT NO. 300 RE: DELETION OF PERMANENTLY DEFUELED TECHNICAL SPECIFICATION 3/4.1.4 “HANDLING OF IRRADIATED FUEL WITH FUEL HANDLING BUILDING CRANE” (EPID L-2019-LLA-0250) DATED DECEMBER 3, 2020

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**ADAMS Accession No.: ML20297A635**

**\*via memorandum/email**

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DATE	12/03/2020		

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

EXELON GENERATION COMPANY, LLC

DOCKET NO. 50-289

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1

AMENDMENT TO RENEWED FACILITY LICENSE

Amendment No. 300  
Renewed License No. DPR-50

1. The Nuclear Regulatory Commission (the Commission or NRC) has found that:
  - A. The application for amendment by Exelon Generation Company, LLC (the licensee), November 12, 2019, as supplemented by letter dated July 8, 2020, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance: (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.c.(2) of Renewed Facility License No. DPR-50 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 300, are hereby incorporated in the license. The Exelon Generation Company shall maintain the facility in accordance with the Permanently Defueled Technical Specifications (PDTS).

3. This license amendment is effective as of its date of issuance and shall be implemented within 90 days following the fuel handling building crane being declared operable, not to exceed February 28, 2021.

FOR THE NUCLEAR REGULATORY COMMISSION



Bruce A. Watson, CHP, Chief  
Reactor Decommissioning Branch  
Division of Decommissioning, Uranium  
Recover, and Waste Program  
Office of Nuclear Material Safety and  
Safeguards

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: December 3, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 300  
THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1  
RENEWED FACILITY LICENSE NO. DPR-50  
DOCKET NO. 50-289

Replace the following page of the Renewed Facility License with the revised page. The revised page is identified by amendment number and contains marginal lines indicating the areas of change.

Remove  
3

Insert  
3

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Remove  
i  
ii  
3/4-10  
3/4-11  
3/4-12  
3/4-13  
5-1a

Insert  
i  
ii  
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---  
5-1a

## **Changes to Renewed Facility License No. DPR-50**

Unit 1 to TMI Unit 2 under this provision shall be limited to: (1) outage-related items (such as contaminated scaffolding, tools, protective clothing, portable shielding and decontamination equipment); and (2) other equipment belonging to TMI Unit 1 when storage of such equipment at TMI-2 is deemed necessary for load handling or contamination control considerations;

- (4) Exelon Generation Company, pursuant to the Act and 10 CFR Parts 30 and 70, to possess at the TMI Unit 1 or Unit 2 site, but not separate, such byproduct and special nuclear materials that were produced by the operation of either unit. Radioactive waste may be moved from TMI Unit 2 to TMI Unit 1 under this provision for collection, processing (including decontamination), packaging, and temporary storage prior to disposal. Radioactive waste that may be moved from TMI Unit 1 to TMI Unit 2 under this provision shall be limited to: (1) dry active waste (DAW) temporarily moved to TMI Unit 2 during waste collection activities, and (2) contaminated liquid contained in shared system piping and tanks. Radioactive waste that may be moved from TMI Unit 1 to TMI Unit 2 under this provision shall not include spent fuel, spent resins, filter sludge, evaporator bottoms, contaminated oil, or contaminated liquid filters.

The storage of radioactive materials or radwaste generated at TMI Unit 2 and stored at TMI Unit 1 shall not result in a source term that, if released, would exceed that previously analyzed in the UFSAR in terms of off-site dose consequences.

The storage of radioactive materials or radwaste generated at TMI Unit 1 and stored at TMI Unit 2 shall not result in a source term that, if released, would exceed that previously analyzed in the PDMS SAR for TMI Unit 2 in terms of off-site dose consequences.

- c. This renewed license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

- (1) DELETED
- (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 300 are hereby incorporated in the license. The Exelon Generation Company shall maintain the facility in accordance with the Permanently Defueled Technical Specifications (PDTS).



**Changes to Technical Specifications  
for License No. DPR-50**

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR MATERIAL

SAFETY AND SAFEGUARDS

RELATED TO AMENDMENT NO. 300 TO

RENEWED FACILITY LICENSE NO. DPR-50

EXELON GENERATION COMPANY, LLC

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

DOCKET NO. 50-289

1.0 INTRODUCTION

By application dated November 12, 2019, as supplemented by letter dated July 8, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession Nos. ML19316C659 and ML20190A108), Exelon Generation Company, LLC (Exelon, the licensee), requested changes to the Permanently Defueled Technical Specifications (PDTs) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). Specifically, the proposed changes would delete PDTs 3/4.1.4, "Handling of Irradiated Fuel with Fuel Handling Building Crane," in its entirety. The amendment would also correct the list of figures to include Figure 5-1, "Extended Plot Plan," and add the proper page number, 5-1a, to Figure 5-1.

The supplemental letter dated July 8, 2020, provided additional information that clarified the application, did not expand the scope of the application as originally noticed, and did not change the NRC staff's original proposed no significant hazards consideration determination as published in the *Federal Register* on February 11, 2020 (85 FR 7791).

2.0 REGULATORY EVALUATION

2.1 Background

By letter dated June 20, 2017 (ADAMS Accession No. ML17171A151), Exelon certified to the NRC that it planned to permanently cease power operations at TMI-1 on or about September 30, 2019, in accordance with 10 CFR 50.82(a)(1)(i). Exelon subsequently permanently ceased power operations at TMI-1 on September 20, 2019. By letter dated September 26, 2019 (ADAMS Accession No. ML19269E480) and pursuant to 10 CFR 50.82(a)(1)(ii), Exelon certified that all fuel had been permanently removed from the TMI-1 reactor vessel and placed in the spent fuel pool (SFP) on September 26, 2019. Upon the NRC's docketing of Exelon's certification that all fuel has been permanently removed from the TMI-1 reactor vessel and placed into the TMI SFP, pursuant to 10 CFR 50.82(a)(2), the 10 CFR Part 50 license for TMI-1 no longer authorizes operation of the reactor or emplacement or retention of fuel in the reactor

vessel. The spent fuel generated by TMI-1's power operations from 1974 to 2019 is stored in two TMI-1 spent fuel pools in the Fuel Handling Building (FHB). The licensee has not yet transferred any of TMI-1's spent fuel into spent fuel storage casks.

The two spent fuel pools (pools A and B) are located in the reinforced concrete FHB, and the gate originally provided between pool A and pool B has been removed. Pools A and B are a single fluid system. Space is provided in pool B to receive a spent fuel shipping cask as well as to provide for required long-term fuel storage. Following a decay period, the spent fuel assemblies could be removed from storage and loaded into the spent fuel shipping cask for transfer to an independent spent fuel storage installation (ISFSI) or removal from the site.

The fuel handling system is designed to handle the spent fuel assemblies underwater until they are placed in a cask for transfer to an ISFSI or offsite storage. The fuel handling system consists of fuel handling bridges with integral fuel handling mechanisms and the FHB crane. The spent fuel assemblies are moved within TMI-1's two spent fuel pools or to the cask loading pit using the fuel handling bridge. The FHB crane is equipped with a main hook designed to accommodate loads up to 110 tons, and an auxiliary hook designed to accommodate up to 15 tons. The FHB crane will be used to transport the empty fuel shipping cask from the receiving/shipping area to the shipping cask area and return the shipping cask to the receiving/shipping area after completion of spent fuel loading into the cask by the fuel handling bridge.

The PDTs numbered 3/4.1.4.1 through 3/4.1.4.7 provide limiting conditions for operation (LCOs), which are operating restrictions concerning the FHB crane to ensure assumptions in the spent fuel cask drop accident are maintained. The PDTs numbered 3/4.1.4.1 through 3/4.1.4.5 were established on April 19, 1974, and were intended to ensure cask handling operations remained within the initial conditions of the spent fuel cask drop accident analysis, which ensured radiological consequences of the event at the site boundary remained within the limits specified in Title 10 of Code of *Federal Regulations* (10 CFR) Part 100. The PDTs numbered 3/4.1.4.6 and 3/4.1.4.7 were incorporated into TMI-1's technical specifications (TSs) by Amendment No. 34, dated December 19, 1977 (ADAMS Accession No. ML003763097), to support modifications that increased the capacity of pool B. Subsequently, in Amendment No. 109, dated July 30, 1985 (ADAMS Accession No. ML003764822), these TSs were changed to their current state to incorporate commitments regarding the control of heavy loads; specifically, the potential drop of spent fuel casks.

The existing FHB crane is prevented from handling heavy loads over TMI-1's spent fuel pools and its adjacent area by a key-interlock system. The automatic travel interlock system is administratively imposed by PDT 3/4.1.4, whenever the fuel handling crane is to transport loads in excess of 15 tons. The interlocks confine the crane bridge and trolley horizontal motions and the vertical lift height of such a load is under administrative control by PDT 3/4.1.4.3. The only area of the collective spent fuel pool structure that may be exposed to a spent fuel cask being accidentally dropped from a height greater than 1 foot is the shipping cask area, which has been designed to withstand the impact from a dropped spent fuel cask.

## 2.2 Proposed Changes

The licensee is proposing to delete PDT 3/4.1.4 and the associated PDT bases in their entirety once a replacement single-failure-proof FHB crane is operable. The licensee stated that the crane modification activity would be evaluated separately under the requirements of 10 CFR 50.59, "Changes, tests, and experiments," which permits implementation of changes to

the facility as described in its updated final safety analysis report (UFSAR) without NRC approval under certain conditions.

The proposed changes also add Figure 5-1, "Extended Plot Plan," to the PDTS Table of Contents, and add a page number to Figure 5-1 as a minor editorial change to correct an omission.

### 2.3 Reason for Proposed Changes

The licensee stated in the amendment request that, in support of decommissioning activities and future transfer of the TMI-1 spent fuel to an on-site ISFSI, the way fuel storage casks are handled inside the FHB would be modified. The existing FHB crane, which is non-single-failure-proof, will be replaced with a single-failure-proof FHB crane that will be designed, fabricated, and tested per the guidelines of NUREG-0554, "Single-Failure-Proof Cranes for Nuclear Power Plants," and will satisfy NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants: Resolution of Generic Technical Activity A-36," which, in combination, would satisfy the Exelon Control of Heavy Loads Program at TMI-1. The installation of a single-failure-proof FHB crane and operation of the FHB crane in accordance with the Exelon Control of Heavy Loads Program at TMI-1 provides assurance that the handling of spent fuel casks in the FHB is performed safely and precludes the need to postulate a Fuel Cask Drop Accident in the FHB. As such, PDTS 3/4.1.4 would no longer be required.

The licensee also stated that an inadvertent omission of Figure 5-1 in the PDTS Table of Contents and a proper page number was identified during implementation of TMI-1 License Amendment No. 297.

### 2.4 Regulatory Requirements

The regulations in 10 CFR Section 50.36(c)(2)(ii) contain the requirements for items that must be included in a technical specification (TS). This regulation provides the four criteria that can be used to determine the requirements that must be included in a TS. A TS limiting condition for operation (LCO) for a nuclear reactor must be established for each item meeting one or more of the following criteria:

Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2: A process variable, design feature, or operating restriction that is 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.

Criterion 3: 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.

Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

### 2.5 Regulatory Guidance

NUREG-0554, "Single-Failure-Proof Cranes for Nuclear Power Plants" identifies features of the design, fabrication, installation, inspection, testing, and operation of single-failure-proof overhead crane handling systems that are used for handling of critical loads.

NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants, Resolution of Generic Technical Activity A-36" provides guidelines for safe load paths, use of load handling procedures, training of crane operators, guidelines slings and special lifting devices, periodic inspection and maintenance for the crane. These guidelines also include the following alternatives to provide defense-in-depth: use of a single failure proof handling system, use of mechanical stops or electrical interlocks to keep heavy loads away from fuel or shutdown equipment, or an analysis demonstrating that the consequences of postulated load drop accidents would be within acceptable limits.

### 3.0 TECHNICAL EVALUATION

#### 3.1 Deletion of PDTS 3/4.1.4

##### 3.1.1 Licensee's Requested Change

The existing 110-ton FHB crane at TMI-1 is underrated for use with the dry cask spent fuel storage system and is non-single-failure-proof. The existing PDTS 3/4.1.4 were required for the original non-single-failure-proof FHB crane design based upon the TMI-1 Fuel Cask Drop Accident analysis as described in the TMI-1 Defueled Safety Analysis Report (DSAR).

The licensee provided the following discussions in Section 2.0, Detailed Description, and Section 3.0, Technical Evaluation, in Attachment 1 to the license amendment request (LAR):

The replacement FHB crane is single-failure-proof and compliant with the guidelines of NUREG-0554 to satisfy the defense-in-depth guidelines of NUREG-0612. The replacement FHB crane is designed with an upgraded main hoist capacity rated for 125 tons to handle the dry cask storage system. The installed location of the replacement FHB crane is not changed.

Upgrading the FHB load handling system to a NUREG-0554 compliant single-failure-proof crane and operating the FHB crane in accordance with the Exelon Control of Heavy Loads Program improves the load handling system reliability to an acceptably low probability of a fuel cask drop such that the Fuel Cask Drop Accident will no longer be credible. As such, the existing PDTS 3/4.1.4 Specifications will no longer be required.

NUREG-0612, "Control of Heavy Loads at Nuclear Power Plants: Resolution of Generic Technical Activity A-36" provides guidance for upgrading handling system reliability and states that new cranes meet the guidelines of NUREG-0554 "Single-Failure-Proof Cranes for Nuclear Power Plants" to be qualified as single-failure-proof cranes. The TMI-1 replacement FHB crane design, fabrication, and testing is compliant with guidelines of NUREG-0554, which is an acceptable approach for single-failure-proof cranes in accordance with NUREG-0612.

The Exelon Control of Heavy Loads Program satisfies the NUREG-0612 Section 5.1, "Recommended Guidelines," for the following defense-in-depth approaches:



(1) Provide sufficient operator training, handling system design, load handling instructions, and equipment inspection to assure reliable operation of the handling system.

(2) Define safe load travel paths through procedures and operator training so that to the extent practical heavy loads avoid being carried over or near irradiated fuel or safe shutdown equipment.

The manner of compliance with NUREG-0612 Section 5.1.2 "Spent Fuel Pool Area-PWR" is changed to an approved approach considering installation and operation of a NUREG-0554 compliant single-failure-proof crane. The implementation and use of a single-failure-proof crane in the SFP area negates the need for the additional controls provided in Section 5.1.2 to compensate for use of non-certified single-failure-proof crane. Although updating the method of compliance with Section 5.1.2 of NUREG-0612, full compliance with NUREG-0612 is maintained through the Exelon [Control of] Heavy Loads Program.

Upgrading the FHB load handling system to a NUREG-0554 compliant single-failure-proof crane and having incorporated the additional defense-in-depth guidance for special lifting devices, lifting devices, and interfacing lift points into the Exelon Control of Heavy Loads Program satisfies NUREG-0612. The FHB crane upgrade will improve the load handling system reliability such that there is an acceptably low probability of occurrence of an uncontrolled lowering, or fuel cask drop so as to effectively preclude consideration of a fuel cask drop accident as a credible event.

In response to an NRC staff request for additional information regarding treatment of special lifting devices, lifting devices (slings), and interfacing lift points as part of a single failure proof handling system consistent with the guidance in NUREG-0612, the licensee supplemented the LAR by letter dated July 8, 2020. In that response, the licensee described that the licensee's procedure, "Control of Heavy Loads Program," complies with the guidance provided in NUREG-0612 and includes guidance and controls for single-failure-proof lifts. The program specifically defines single-failure-proof special lifting devices as those meeting the specified criteria of American National Standards Institute (ANSI) N14.6, "Standard for Special Lifting Devices for Shipping Container Weighing 10,000 Pounds or More for Nuclear Materials," section titled – "Special Lifting devices for Critical Loads." The licensee also stated that, for slings and rigging components, the program specifies the use of redundant rigging or the use of rigging that is rated at two times the calculated combined static and dynamic load capacity. Therefore, the Exelon Control of Heavy Loads Program provides, in combination with the upgraded NUREG-0554 compliant FHB crane, the additional defense-in-depth associated with guidelines from NUREG-0612, Section 5.1.6, to operate as a single-failure-proof handling system, which sufficiently reduces the likelihood of a load drop such that the NRC staff does not consider a load drop credible.

### 3.1.2 NRC Staff Evaluation

The NRC staff evaluated the acceptability of deleting PDTS 3/4.1.4 based on the four criteria in 10 CFR 50.36(c)(2)(ii), which defines when an LCO must be retained.

Criterion 1: Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

This criterion addresses instrumentation installed to detect excessive reactor coolant system (RCS) leakage. TMI-1 has been permanently shutdown with its reactor permanently defueled. Therefore, this criterion is not applicable.

Criterion 2: A process variable, design feature, or operating restriction that is 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.

The installation and operation of a replacement single-failure-proof FHB crane that complies with NUREG-0554 and NUREG-0612 significantly reduces the potential for a spent fuel cask drop accident. With a single-failure-proof FHB crane installed and procedures specifying the use of lifting devices with enhanced factors of safety or redundant load paths connected to robust interfacing lift point, the NRC staff does not consider any event credible that would result in a spent fuel cask drop (i.e., the spent fuel cask drop accident is not sufficiently probable to be considered as a design basis accident). Therefore, operating restrictions regarding spent fuel element decay prior to loading, imposition of crane travel interlocks, and load height are not initial conditions of a design basis accident and need not be retained in the PDTs. The other conditions and operating restrictions included in existing PDTs 3/4.1.4.4 through 3/4.1.4.7 never represented initial conditions of a design basis accident but are part of routine administrative controls included in the guidelines of NUREG-0612 and the Exelon Control of Heavy Loads Program. Therefore, Criterion 2 of 10 CFR 50.36(c)(2)(ii) does not require retention of the conditions included in existing PDTs 3/4.1.4.

Criterion 3: 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.

The installation and operation of a replacement single-failure-proof FHB crane that complies with NUREG-0554 and NUREG-0612 prevents any load drop following credible component failures that could pose a challenge to a fission product barrier. Thus, the replacement FHB crane is not part of the primary success path and which functions or actuates to mitigate an accident or transient that either assumes or presents a challenge to a fission product barrier. Therefore, this criterion is not applicable to the replacement FHB crane or any other SSCs related to spent fuel cask handling.

Criterion 4: A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The purpose of this criterion is to capture only those SSCs that operating experience or probabilistic risk assessment has shown to be significant to public health and safety. Neither operating experience nor a probabilistic risk assessment has shown that installation and operation of a replacement single-failure-proof FHB crane that complies with NUREG-0554 and NUREG-0612 or any other SSCs associated with spent fuel cask handling are significant to public health and safety. The NRC staff considers the existing PDTs conditions operating restrictions to ensure the existing spent fuel cask drop accident analyses results are acceptable, and, therefore, this criterion is not applicable to the retention of existing PDTs 3/4.1.4.

The NRC staff concludes, based on the above evaluation, that PDTs 3/4.1.4 no longer meets

any of the criteria in 10 CFR 50.36(c)(2)(ii) once the single-failure-proof FHB crane is installed and full compliance with NUREG-0612 is met and maintained through the Exelon Control of Heavy Loads Program.

The NRC staff also reviewed the LCOs in PDTS 3/4.1.4 and the associated bases:

LCO 3.1.4.1 states that spent fuel having less than 120 days for decay of their irradiated fuel shall not be loaded into the spent fuel transfer cask in the shipping cask area. Since all the spent fuel has been relocated to TMI-1's fuel pools for longer than 120 days, this LCO no longer is applicable.

The bases for PDTS 3/4.1.4 include information derived from the analyses and evaluations included in the DSAR. The bases state that LCOs 3.1.4.1 through 3.1.4.7 ensure the consequences of a postulated spent fuel cask drop accident stay within the analysis assumptions as stated in Section 6.3 of the DSAR or contribute to reducing the likelihood of a load drop. The proposed changes to install a NUREG-0554 compliant FHB crane and additional defense-in-depth associated with incorporation of guidelines from NUREG-0612 incorporated in the Exelon Control of Heavy Loads Program significantly reduces the probability of fuel cask drop accident such that it would no longer be considered a design basis accident. Therefore, the NRC staff concludes that the deletion of PDTS 3/4.1.4 including the associated bases is acceptable.

### 3.2 Editorial Changes to PDTS

The licensee stated that two omissions were identified during implementation of TMI-1 License Amendment No. 297. Figure 5.1, "Extended Power Plan" was included in the PDTS without proper identification in the PDTS Table of Contents or a page number. The proposed changes identify the page of the figure as 5-1a and add it to the PDTS Table of Contents, page ii. As these are not technical changes and are editorial in nature, the NRC staff finds the proposed changes to be acceptable.

### 4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Commonwealth of Pennsylvania's official was notified of the proposed issuance of the amendment on November 5, 2020. The Commonwealth of Pennsylvania official had no comments.

### 5.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or a surveillance requirement. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding published in the *Federal Register* on February 11, 2020 (85 FR 7791). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

## 6.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) there is reasonable assurance that such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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