



November 7, 2022  
TMI2-RA-COR-2022-0023

10 CFR 50.90  
10 CFR 50.91  
10 CFR 20

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
NRC Possession Only License No. DPR 73  
NRC Docket No. 50-320

**Subject:** License Amendment Request – Three Mile Island, Unit 2,  
Decommissioning Technical Specifications, Response to Request for  
Information Regarding Radiation Protection Program Ventilation Controls

**References:**

- (1) Letter TMI2-RA-COR-2022-0021 from van Noordennen, G.P. (TMI-2 Solutions, LLC) to Document Control Desk (U.S. NRC), "License Amendment Request – Three Mile Island, Unit 2, Decommissioning Technical Specifications," dated 19 February 2021 ([ML21057A046](#))

Reference 1, as supplemented, is currently undergoing an acceptance review for approval by the NRC in order for TMI-2 to transition into active decommissioning (DECON) from its current Post-Defueling Monitored Storage (PDMS) condition. Reference 1 stated that the TMI-2 Radiation Protection Program (RPP) will identify the controls that will be implemented through procedures for DECON activities occurring inside the TMI-2 Reactor Building. Implementation of these procedures take into account detailed planning and execution of the DECON work and support activities, including measures to maintain occupational dose As Low As Reasonably Achievable (ALARA) and below the occupational dose limits in 10 CFR 20 during DECON.

During a clarification call on September 29, 2022, TMI-2 Solutions discussed the ventilation requirements for DECON based on the RPP and that there are no safety-related systems, structures, or components needed for DECON. In an email from the NRC Project Manager following the clarification call, the NRC Technical Reviewers requested more information on the proposed RPP discussions and commitments with regards to ventilation and containment. TMI-2 Solutions is submitting this correspondence to supplement Reference 1 with this additional information.

NMSSD1  
NMSS

As stated above, control of requirements for Reactor Building ventilation while work is being performed during DECON will be controlled by the RPP procedures. The ALARA Planning procedure allows work that has a potential to create airborne contamination (e.g., cutting, welding, grinding on contaminated components, breach of contaminated system, lifts of large, contaminated components or heavy lifts over areas with high levels of contamination) to occur provided:

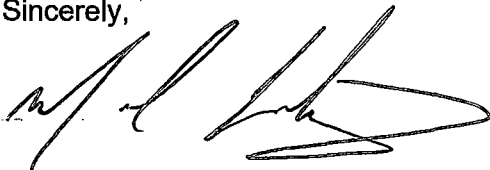
- Personnel and equipment access openings are closed, and
- Reactor Building Ventilation system is in operation, or
- The work is locally controlled with an enclosure and HEPA ventilation.

In the event that the NRC has any questions with respect to the content of this submittal, please contact Mr. Timothy Devik, TMI-2 Licensing Manager, at 603-384-0239.

In accordance with 10 CFR 50.91(7)(b)(1), a copy of this submittal has been sent to the Commonwealth of Pennsylvania.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 7 November 2022.

Sincerely,



Mike Lackey  
Senior Vice President  
D&D Operations  
EnergySolutions

cc:

Regional Administrator – NRC Region I  
NRC Lead Inspector – Three Mile Island Nuclear Station – Unit 2  
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