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November 24, 1982
 NRC/TMI-82-071

Docket No. 50-320

Mr. B. K. Kanga
 Director, TMI-2
 CPU Nuclear Corporation
 P. O. Box 480
 Middletown, PA 17057

Dear Mr. Kanga:

We have reviewed your supplement (Letter 4410-82-L-0037, B. Kanga to L. Barrett, dated November 3, 1982) to the Reactor Coolant Processing Plan to assess the safety aspects of processing reactor coolant with the reactor coolant system (RCS) in the depressurized and drained down condition. The only significant difference from processing in the drained down condition versus the pressurized, filled condition is the need to monitor and maintain water level in the RCS within a prescribed range. You have committed to monitoring the RCS water level with the instrumentation installed for the Quick Look Evolution to measure the hydrostatic head in the RCS. Further, during the feed and bleed operations to the RCS, you will monitor the levels in RCS bleed tanks to ensure that RCS letdown corresponds to makeup. The Standby Pressure Control System will provide a backup source of makeup water. With regard to the potential for a boron dilution incident, the plant operating procedures require that the water level in the secondary side of the plant be maintained at a lower elevation than the primary side to prevent inleakage through the steam generators. Processing of reactor coolant through the Submerged Demineralizer System has been addressed in the staff's Safety Evaluation Report (NUREG-0796), and the staff's conclusion that environment impacts fell within the scope of the Programmatic Environmental Impact Statement is still applicable.

We conclude that adequate measures have been provided to monitor and maintain RCS water level and minimize the potential for a boron dilution incident and, subject to pending approval of the necessary operating procedures, according to Technical Specification 6.8.2, we approve the implementation of the supplement to the Reactor Coolant Processing Plan.

Lake H. Barrett
 Deputy Program Director
 TMI Program Office

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cc: J. Barton
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