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October 24, 1985

TMI Program Office
Attn: Dr. B. J. Snyder
Program Director
US Nuclear Regulatory Commission
Washington, DC 20555

Dear Dr. Snyder:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Commencement of TMI-2 Preliminary Defueling Operations

The Early Defueling Safety Evaluation Report (SER), Revision 4, which was forwarded by GPU Nuclear letter 4410-85-L-0200, dated October 10, 1985, describes in detail the currently planned activities and supporting tooling and equipment for completion of the early stages of defueling of the TMI-2 reactor vessel. Based on the current state of readiness of the TMI-2 Project, the start of certain preliminary defueling activities, which are a prerequisite to the actual loading of core debris into the defueling canisters, is imminent. In addition, the need exists to select core debris samples for analysis by INEL to further our knowledge of the condition of the damaged core. The purpose of this letter is to advise you that we plan to begin such activities during the week of October 28, 1985, (potentially, initial activity will begin as early as October 29th) and to define the limit of these activities in the context of the above referenced SER.

Except as specifically defined herein, defueling operations described in the Early Defueling SER will not commence until NRC approval of the Early Defueling SER and Defueling Canister Technical Evaluation Report (TER) have been received by GPU Nuclear. For example, the planned activities will not include the installation of defueling canisters in the reactor vessel, loading of canisters with core debris or movement of fuel-loaded canisters to the canister storage racks. As exceptions, the filter canisters currently installed in the DWCS will be used in their intended

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mode as it is expected that the Reactor Vessel Loop portion of the DWCS (including the sidestream flow to the SDS) will begin full operation prior to the start of defueling activities, and a single filter canister will be emplaced within the Reactor Vessel for a brief period for the sole purpose of conducting a canister dewatering system test.

The preliminary defueling activities will be performed wholly within the reactor vessel and will consist of the segmentation and movement of core debris (i.e., core alterations) necessary to permit full operation of the Canister Positioning System (CPS) as a prerequisite to fuel loading, and selection of samples needed for early transfer to INEL. These activities may include the loading of small pieces of core debris into debris baskets but will not include actual loading of fuel debris into fuel canisters. The reconfiguration of the core debris will be conducted in accordance with Section 6.2.2 of the TMI-2 Technical Specifications and will be bounded by the TMI-2 Criticality Analysis previously forwarded by GPU Nuclear letter 4410-84-L-0199, dated November 8, 1984. The handling of loads over the reactor vessel will be in accordance with the SER for Heavy Load Handling Over the Reactor Vessel.

The above described operations will involve the use of defueling tooling - including hydraulically operated tools - and equipment described in the Early Defueling SER, which is currently pending NRC approval. Operating procedures for these activities are subject to NRC approval, as appropriate. To the extent that these activities are bounded by existing defueling procedures, it is intended that those procedures will be utilized within the operating limits defined above. Therefore, provisional approval of Procedure 4200-OPS-3255.01 for the purpose of conducting the activities specified herein, is requested. In addition, prior to conducting operations using the hydraulically operated tools, we will provide the results of the tests of the borated hydraulic fluid to demonstrate miscibility, compatibility with the canister recombiner catalyst and stability as a homogeneous borated fluid.

The preliminary defueling operations will be supervised, most likely from the Command Center, by NRC-licensed Fuel Handling Senior Reactor Operators (FHSRO).

Actual loading of fuel into TMI-2 defueling canisters, planned to begin early in the month of November, 1985, will require NRC approval of the Canister Technical Evaluation Report (TER) and the Early Defueling SER. The movement of defueling canisters from the reactor vessel to the storage racks in either the deep end of the Fuel Transfer Canal or in Fuel Pool 'A' is currently expected to begin by mid-November, 1985, and will require NRC approval of Revision 2 of the Heavy Load Handling SER.

Dr. B. J. Snyder

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GPU Nuclear will advise you of any changes to the plan and schedule described above.

Sincerely,



F. R. Standerfer

Vice President/Director, TMI-2

FRS/JJB/eml

Attachment

cc: Deputy Program Director - TMI Program Office, Dr. W. D. Travers