

November 16, 1993

Docket No. 50-320

Dr. Robert L. Long
Director Corporate Services/
Director, TMI-2
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057

Dear Dr. Long:

SUBJECT: REVIEW OF THE OCTOBER 24, 1993, REQUEST TO REVISE THE TMI-2 PDMS
REQUIREMENTS AND COMMITMENTS (TAC NO. M85665)

Amendment 18, dated October 24, 1993, to your Post Defueling Monitored Storage (PDMS) Safety Analysis Report (SAR) requested changes to your list of PDMS requirements and commitments dated January 15, 1993, as revised by NRC letter dated August 5, 1993.

The staff has completed its review of your proposed changes to the list. A copy of our evaluation is enclosed. We have concluded that the proposed changes do not constitute an unreviewed safety question and that the changes described fall within the bounds of Final Supplement 4 to the Programmatic Environmental Impact Statement issued by the staff in August 1989. A copy of the revised list of PDMS requirements and commitments is enclosed. The revised list is designated Revision 2. These changes are effective as of the date of this letter.

Sincerely,

Original signed by:
Michael T. Masnik, Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation
2. Revised List

cc w/enclosures:

See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D. C. 20555-0001

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Director Corporate Services/
Director, TMI-2
GPU Nuclear Corporation
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Sincerely,

A handwritten signature in cursive script, reading "Michael T. Masnik", is written over a horizontal line.

Michael T. Masnik, Senior Project Manager
Non-Power Reactors and Decommissioning
Project Directorate
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosures:

1. Safety Evaluation
2. Revised List

cc w/enclosures:
See next page

Dr. R. L. Long
GPU Nuclear Corporation Unit No. 2

cc:

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO FACILITY OPERATING LICENSE NO. DPR-73

GPU NUCLEAR CORPORATION

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-320

1.0 INTRODUCTION

By letter dated October 24, 1993, GPU Nuclear Corporation (GPUN or the licensee) requested changes to the NRC approved list of remaining Post Defueling Monitored Storage (PDMS) requirements and commitments. These requirements and commitments were originally forwarded to the NRC in a letter dated January 15, 1993. The January 15, 1993 list was developed by the NRC staff and the licensee during a series of meetings at the TMI-2 site during the fall of 1992. The NRC staff reviewed the January 15, 1993 list and approved the list in a letter dated May 19, 1993. The approved list included a procedure to allow for changes to the list of requirements and commitments in recognition of the difficulties associated with readying the facility for long term storage and the changeable nature of the effort. In Amendment No. 17 to the PDMS SAR, dated May 28, 1993, the licensee requested changes to the approved list. The proposed changes to the January 15, 1993 list were approved by the staff in a letter to the licensee dated August 5, 1993. The August 5, 1993 letter contained an updated listing of all requirements and commitments.

2.0 DISCUSSION AND EVALUATION

The October 24, 1993 submittal by the licensee requested changes to the August 5, 1993 approved list. The licensee requested to correct a number of references to sections in their safety analysis report and to modify several items. The staff evaluation of each of the proposed changes by the licensee to the PDMS list of requirements and commitments is as follows:

(1) Item H.7, delete the phrase "...and from a locally mounted battery during emergency conditions."

Evaluation: The original list required that exit signs at the facility would be powered by both a normal lighting system with a battery backup in case of power failure. The licensee proposes eliminating the requirement for a battery backup for the exit signs. Originally, the licensee had proposed that the facility would not maintain an emergency lighting in the facility. This proposal prompted the requirement for the lighted exit signs to include a battery backup system. The licensee has since decided to maintain the plant

emergency lighting system (Section 7.2.5.2 of the PDMS SAR). This lighting system will allow the safe egress of personnel under both normal and emergency conditions. Therefore, a requirement to have a battery backup to the exit signs is not required since the exit signs will be visible from light from the installed emergency lighting. The staff finds the change acceptable.

- (2) Item I.1, change the reference to the PDMS SAR from 7.2.2.2k to 7.2.2.2i.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

- (3) Item I.2, delete this requirement.

Evaluation: The original list requires that the licensee provide and maintain automatic fire suppression to areas of the facility and systems which contain significant amounts of combustibles and possible ignition sources. The licensee requests that this requirement be deleted. Automatic fire suppression was originally provided to areas of the facility and systems which contained significant amounts of combustibles and possible ignition sources (eg. charcoal filters, diesel generators). The licensee has, for the past several years undertaken an extensive campaign to remove combustible materials from the facility and electrically deactivate systems that are no longer needed. The licensee has determined that there will be no location in the facility during PDMS that will contain significant enough quantities of combustible materials and possible ignition sources that would require automatic fire suppression. The staff has been monitoring the licensee program to deactivate electrical systems and remove combustibles. Based on recent walkdowns of the facility, no significant quantities of combustibles have been in evidence. The staff has determined (Safety Evaluation Report (SER), dated February 20, 1992, Section 6.4) that offsite releases from any credible fire would result in only a small percentage of the dose specified in 10 CFR Part 100 for determination of exclusion areas. The staff, in SER Section 6.4, recommended both fire detection and manual suppression capabilities at the facility. The SER did not determine that automatic suppression capability be required or even advisable. Therefore, the staff finds the proposal acceptable.

- (4) Item I.3, delete the phrase "...identify the specific zone in which a fire in the TMI-2 facility is located" and replace with "Identify the specific zone panel which indicates the location of the fire in the TMI-2 facility."

Evaluation: This proposed change clarifies precisely what the remote readout panel provides in the TMI-1 control room. The readout does not specify the specific zone in TMI-2 but rather the zone panel in the TMI-2 control room that has received the alarm signal. The TMI-1 operator will be able to tell the location of the fire based on the identified zone panel. The staff views this change as a clarification of the commitment. The staff finds the change acceptable.

(5) Item 1.4, remove the ";" after the word "operations."

Evaluation: The proposed change corrects a minor typographical error by removing the semicolon after the word "operations." The semicolon is not needed. The staff finds the change acceptable.

(6) Item 1.7 and 1.8, remove reference to PDMS SAR Figures 7.2-6 and 7.2-7, and specify that fire extinguishers and self-contained breathing apparatus will be staged with the emergency response crew equipment.

Evaluation: The current requirement requires that portable fire extinguishers and self contained breathing apparatus be available for use as specified in Figures 7.2-6 and 7.2-7 of the PDMS SAR. The licensee proposes removing the reference to Figures 7.2-6 and 7.2-7 and states that the equipment will be staged with other emergency response equipment. Figures 7.2-6 and 7.2-7 of the PDMS SAR have been deleted from the PDMS SAR by Amendment No. 18. The licensee stated that the figures were limited in scope and incorrect as shown. Rather than correct the figures, the PDMS SAR was updated to present a more general description of the location of the equipment. Requiring the licensee to specify that level of detail is unnecessary. Emergency equipment staging will be controlled by an approved fire protection procedure which is sufficient. The staff finds the changes acceptable.

(7) Item 1.11, change the reference to the PDMS SAR from 7.2.2.2k. to 7.2.2.2i.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(8) Item 1.12, change the reference to the PDMS SAR from 7.2.2.2k. to 7.2.2.2i.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(9) Item 1.15, change the reference to the PDMS SAR from 7.2.2.2g. to 7.2.2.2f.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(10) Item 1.16, change the reference to the PDMS SAR from 7.2.2.2h. to 7.2.2.2g.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(11) Item I.18, change the reference to the PDMS SAR from 7.2.2.2i. to 7.2.2.2h.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(12) Item I.19, change the reference to the PDMS SAR from 7.2.2.2m. to 7.2.2.2k.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(13) Item I.20, change the reference to the PDMS SAR from 7.2.2.2i. to 7.2.2.2j.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(14) Item I.21, change the reference to the PDMS SAR from 7.2.2.2k. to 7.2.2.2i.

Evaluation: This is an administrative change that corrects a changed reference in the PDMS SAR. The staff finds the change acceptable.

(15) Item M, change the reference to SAR Amendment 15 to SAR Amendment 18.

Evaluation: This is an administrative change to reflect the most current amendment to the PDMS SAR.

3.0 CONCLUSION

The October 24, 1993 proposed changes to the PDMS requirements and commitments list of January 15, 1993, as revised August 5, 1993, will not adversely affect the health and safety of the public. These changes do not constitute an unreviewed safety question, nor do they involve a significant hazard or an environmental impact. The changes described fall within the bounds of Final Supplement 4 to the Programmatic Environmental Impact Statement issued by the staff in August 1989.

Principal Contributor: Michael T. Masnik

Date: November 16, 1993

LIST OF PDMS
REQUIREMENTS AND COMMITMENTS
REVISION 2

Additional Requirements/Licensee Commitments

A. Removal of Water from Reactor Coolant System and Fuel Transfer Canal

1. Remove water to the extent reasonably achievable.
 - Reactor Vessel; drained to less than 10 gallons (38 liters) of water. (SAR 6.2.27.2; TER 5-9)
 - Reactor Building Fuel Transfer Canal. (TER 5-9)
2. Isolate the fuel transfer tubes. (SAR 1.1.2.1).
3. Drill holes in canal seal plate to prevent refueling canal from filling. (TER 5-9)
4. Cover the Reactor Vessel to minimize water entry. (SAR 6.2.27.2)
5. Drain the Submerged Demineralizer System to the extent reasonably achievable. (SAR 6.2.36.2)
6. Drain and cover the "B" spent fuel pool to the extent reasonably achievable. (SAR 6.2.36.2)
7. Drain and cover the "A" spent fuel pool to the extent reasonably achievable. (SAR 6.2.3.2)

B. Radiation Safety & Reduction of Potential for Releases

1. Ship offsite or package and stage for shipment remaining radioactive waste from the major TMI-2 decontamination activities. (SAR 1.1.2.1; TER xiv)
2. Reduce radiation levels within the facility, to the extent reasonably achievable and consistent with ALARA, to allow plant monitoring, maintenance, and inspection. (SAR 1.1.2.1; TER xiv)
3. Apply shielding in critical locations after reactor vessel draindown to reduce dose rates. (TER 5-23)
4. Define and establish an overall surveillance program plan for PDMS environmental protection systems to ensure public health and safety. (TER xiv)

C. Ventilation

1. Verify that a surveillance program exists to ensure AFHB ventilation and filtration operability, maintenance and testing. (SAR 7.1.2 and 7.1.3; TER 6-26)
2. Verify that the licensee has procedures in place to continue to operate the AFHB ventilation system until the Accident Generated Water is no longer being processed or transferred in the AFHB. (TER 6-28)
3. Ensure that penetration R-626 has been upgraded to 5 psi. (SAR Supp. 3, Item B.2; TER 6-17)
4. Ensure that the reactor building breather system is the predominant pathway for effluent and influent to the building during those times that the reactor building ventilation system is not being operated; and that the effluent is filtered and monitored. (SAR 7.2.1.2; TER 6-25).
5. DOP test the HEPA filter in breather prior to entry into PDMS. (SAR 7.2.1.2.2 and Supp. 3, Item B.3; TER 6-25)
6. Ensure installation, actuation setting, and routine surveillance testing of the isolation valve between containment and HEPA filter in the reactor building breather (to automatically close upon receipt of a containment pressure increase of 0.25 psi). (SAR 7.2.1.2; TER 5-10, 5-11, and 6-24)
7. Develop and implement a reactor building entry procedure that requires an evaluation of the reactor building atmospheric conditions prior to personnel entry. (SAR 7.2.1.3)
8. Develop and implement procedures for maintaining HEPA filter banks for the Reactor Building Purge System. (SAR 7.2.1.3)
9. Develop and implement procedures for monitoring the Reactor Building vent during reactor building purge. (SAR 7.2.1.3)

D. Plant Contamination Survey

1. Licensee will meet established contamination level goals for entrance into PDMS for each area of the AFHB. If the decontamination goals cannot be met because of the unique situation at TMI-2 or ALARA considerations, the licensee will provide an evaluation of the specific situation to the NRC. (SAR 5.3.1 and Supp. 3, Item A.11; TER p. 4-2)

2. Update information in the following tables from the SAR as final decontamination results become available. (SAR 5.3.2)
 - Table 5.3-2 (SAR) "PDMS Radiological Conditions - AFHB"
 - Table 5.3-4 "Surface Contamination - Reactor Building"
 - Table 5.3-5 "Surface Contamination - AFHB"
 - Table 5.3-6 "Surface Contamination - Other Buildings"
3. Perform survey of the service building, elevation 305 ft.; the turbine building, elevation 281 ft. and the containment air control envelope building and provide information in the PDMS SAR before entry into PDMS in order to establish a radiological baseline for the facility. (SAR 5.3.2; TER 4-2)
4. Ensure that a program exists for periodic measurement of radiation and contamination levels to verify radiological conditions. (SAR 7.2.4.1 and 7.2.4.2; TER 6-42 and 6-43).

E. Physical Maintenance in Reactor Building and Vessel

1. Have the capability of inserting a video camera into the reactor vessel to verify fuel location if it is determined at a later time that such an examination is required. (TER 6-3)
2. Create a program plan to perform monthly entries into the reactor building for at least 6 months after placing it into its PDMS condition. (PDMS SAR 7.2.4; TER 5-23)

F. Physical Maintenance in AFHB

1. Create a program plan to perform monthly entries into the AFHB for at least 6 months after placing it into its PDMS condition. (SAR 7.2.4; TER 5-23)
2. Ensure that both fuel pool structures remain intact (SAR 7.1.3.2)

G. Physical Maintenance in other Buildings

1. Ensure that the Control Room Ventilation Systems (i.e., Control Room HVAC and Cable Room HVAC) and the Service Building Ventilation System are maintained in an operational condition and will be operated as required. (SAR 7.2.6.8,9,10)

2. Maintain the capability to process potentially contaminated liquids. (SAR 7.2.3.1; TER 5-14)

H. Electrical Related

1. In reactor containment, reactor building electric power circuits will be deenergized except those necessary for PDMS monitoring, inspection, and surveillance equipment and other PDMS support requirements. (SAR 7.1.1.4; Supp. 1, Item 17; TER 6-34 and 6-38)
2. In the auxiliary building, the power to lighting, fire detectors, and sump level indication circuits will be energized and will remain operational. The auxiliary sump, auxiliary sump tank and associated level indication will also remain operational. (SAR 7.1.2.2; TER 6-37)
3. In the fuel-handling building, low voltage circuits to lighting and fire detection will be energized. (SAR 7.1.3.2; TER 6-37)
4. In the Control and Service Buildings, verify that the electrical distribution will remain configured to power low voltage lighting loads and fire detectors. (SAR 7.1.7.2)
5. Portions of the TMI-2 electrical distribution system will be operational and energized to provide power for the PDMS support systems and their associated controls and instrumentation. Power will be available for area lighting, receptacles, heating, and ventilation to support PDMS activities. (SAR 7.2.5.1.1; TER 6-37)
6. Emergency lighting (8-hr portable emergency lights) is staged with emergency response crew equipment. (SAR 7.2.5.2.1; TER 6-37)
7. Verify that exit signs are powered from the normal lighting system. (SAR 7.2.5.2.2)
8. DC power during PDMS will be available. Loads have been consolidated where practicable to reduce the number of energized circuits. (SAR 7.2.5.1.3; TER 6-38)
9. Deleted

1. Fire Protection

1. Have procedures in place to ensure that the fire mains within the reactor building will be closed with valves drained to the extent reasonably achievable within 30 days following entry into PDMS to minimize the potential for introduction of water into the reactor vessel. (SAR 7.2.2.2i.; TER 6-2)
2. Deleted.
3. Ensure that either the TMI-2 control room or some other location is continuously manned with a fully qualified person or that remote monitoring capabilities are available in TMI-1 control room to identify the specific zone panel which indicates the location of the fire in the TMI-2 facility. Ensure that procedural control exists to delineate the location of the monitoring activity. (TER 6-29; SAR 7.2.2.2b.)
4. Demonstrate that TMI-1 Operations has accepted responsibility for maintaining the fire service system in operable areas of the plant as required to support operations in the waste-handling and packaging facility, the respirator cleaning facility and the administration building. (TER 6-29)
5. Deactivate deluge systems in the auxiliary building and the control building. (SAR 7.2.2.3; TER 6-29)
6. Ensure that all Halon systems have been deactivated by disconnecting the cylinders and either emptying or removing them. (SAR 7.2.2.2d.)
7. Verify that portable fire extinguishers are staged with emergency response crew equipment. (SAR 7.2.2.2e.)
8. Verify that self-contained breathing apparatus are staged with emergency response crew equipment. (SAR 7.2.2.2e.)
9. Ensure that the fire detection system remains operational in the Air Intake Tunnel and the relay room. (SAR 7.2.2.2d.)
10. Deleted.

11. To the extent that fire protection is not required in work or storage areas, ensure isolation of the 12-inch fire service loop, which runs through the AFHB, the control building area and the turbine building (east and west). (SAR 7.2.2.2i.; TER 6-32)
12. Ensure that the fire system line is cut and blanked off at the fuel-handling building, where the fire system line runs from the diesel generator building. (SAR 7.2.2.2i.; TER 6-32)
13. Deactivate the river water pump house. (SAR 6.1.10; TER 6-33)
14. Deactivate the fire pump house. (SAR 6.1.10 and Supp. 1, Item 14; TER 6-33)
15. Ensure that transient combustibles have been removed from inside the containment and the AFHB to the extent practicable. (SAR 7.2.2.2f.; TER 6-33) This includes most plant items installed after the accident. Fire loading must be less than a 1-hour loading of 80,000 BTU/square foot. (SAR Supp. 1, Item 17)
16. Drain oil to the extent reasonably achievable from the main turbine, feedwater pump turbines, emergency feedwater pump turbine, main feedwater pumps, emergency feedwater pumps, condensate pumps, condensate booster pumps and hydrogen seal oil unit. (SAR 7.2.2.2g.; TER 6-34)
17. Taken as an aggregate, demonstrate that no more than 57 percent of the original total volume of reactor coolant pump lubricating oil remains in the upper and lower reservoirs of the four reactor coolant pump reservoirs. (SAR Supp. 1, Item 33; TER 6-34)
18. Charcoal filters have been removed from all HVAC systems in TMI-2. (SAR 7.2.2.2h.; TER 6-34)
19. Train and familiarize station fire brigade with the TMI-2 system configurations, plant layout and procedures for TMI-2. (SAR 7.2.2.2k.; TER 6-35)
20. Procedure in place for reactivation of the deactivated portions of the fire protection system if necessary. (SAR 7.2.2.2j.; TER 6-29)
21. Verify that the procedure for inspection of the fire loop drain valves during freezing weather is in place. (SAR 7.2.2.2i.; TER 6-32)
22. Verify that the procedures and system are in place for testing of the operable portion of the fire detection and alarm system. (SAR 7.2.2.2b.; TER 6-34)

23. Verify that procedures for manual suppression of fire by the fire brigade are provided as stated in the FPPE. (TER 6-35)

J. Flood Protection

1. Ensure that flood panels are provided for all entrances to the control building, and to the entrance of the auxiliary building. (TER 6-36) Doors and entrances to the Control Building Area that are not flood-protected are either watertight or are provided with flood panels. All openings that are potential leak paths (i.e., ducts, pipes, conduits, cable trays) are sealed. (SAR 7.1.4)
2. Verify that the containment basement and auxiliary building sumps level indications will be maintained. (SAR 7.2.3.1.2)
3. Verify that the auxiliary building sump pumps are maintained operational and placed in a manual control mode. (SAR 7.2.3.1.2)
4. Verify that the Miscellaneous Waste Holdup Tank and the Auxiliary Building Sump Tank (ABST) have been isolated from the Radwaste Disposal Gas System and vented via HEPA filters to protect against airborne releases from these tanks. (SAR 7.2.3.1.2)
5. Ensure that a flow path exists to drain down the reactor building basement floor. (SAR 7.2.3.1.2)
6. Deleted
7. Deleted
8. Ensure that the active sumps have a high level alarm that annunciates in the control room and the PDMS Alarm Monitoring System. (SAR 7.2.3.2.2)

K. Procedures and Programs

1. Include a surveillance program under which a limited number of rodent carcasses will be analyzed for gamma-emitting isotopes as part of the non-routine Radiological Environmental Monitoring Program. (SAR Supplement 3, A.16)

L. STANDARDS FOR SATISFYING REQUIREMENTS AND COMMITMENTS

The staff recognizes that many of the above requirements and commitments have been acted upon by the licensee. Once this list is finalized, the licensee will submit a letter that documents which of the listed requirements and commitments have been satisfied. The letter will reference primary documentation (UWIs, procedure numbers, drawings, etc.) that demonstrate that the work was completed or the requirement or commitment met. It will not be necessary to submit the primary reference documents but only have them accessible at the TMI-2 site. The staff will verify by reviewing the primary documentation and/or inspection of the actual modification. Once the staff has conducted its review and determined that the requirement or commitment has been satisfied, the staff will close out the item. As other items are completed, the licensee will continue to notify the staff in writing of the completed status and identify the appropriate primary references. The staff and licensee plan to agree prior to notification of completion of an item what constitutes the standard for demonstrating completion of the item.

M. PROCEDURES FOR CHANGING THE ABOVE REQUIREMENTS AND COMMITMENTS

During the remainder of the current cleanup effort, conditions may change resulting in a change in the licensee's ability to satisfy the above requirements and commitments. Licensee's request for deviations to the above list of requirements and conditions must be made in writing, as an amendment to the SAR, providing a description of the old requirement or commitment and a description of the change. The deviation request must include a safety analysis evaluating the proposed change. Requests for deviations to the above list must be timely and allow for staff review (typically 60 days). The NRC staff will either approve or disapprove the licensee's request in writing based on the results of the staff review. The licensee understands that PDMS was evaluated and received staff approval based on the requirements and commitments made by the licensee through SAR Amendment 18. Significant changes to the requirements and commitments may invalidate, or require a reevaluation of the staff's Safety Evaluation and Technical Evaluation Report.