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March 1, 1985
NRC/TMI 85-015

Docket No. 50-320

GPU Nuclear Corporation
ATTN: Mr. F. R. Standerfer
Vice President/Director, TMI-2
P. O. Box 480
Middletown, PA 17057

Dear Sir:

Subject: Recovery Operations Plan Change Request No. 28;
Change Approval No. 25

Reference: GPU letter, 4410-85-L-0031, from F. R. Standerfer to
W. D. Travers, dated February 7, 1985.

The referenced letter proposed to change the Recovery Operations Plan by deleting the requirement to maintain an area gamma radiation monitor at the reactor vessel flange. The requirement for the Reactor Vessel Area Gamma Monitor is contained in Table 4.3-3 of the Recovery Operations Plan. The NRC staff initiated the requirement for the vessel gamma monitor as part of the Amendment of Order which was issued on December 19, 1984.

The requirement for the monitor was added by the staff to provide indication of core reactivity changes which may be detected by a gamma dose rate increase at the reactor vessel flange. We concur with the rationale contained in the safety evaluation accompanying your proposed change to the Recovery Operations Plan which noted that source range and intermediate range neutron detectors are installed to provide indication of reactivity changes in the core. These monitors are addressed in the Technical Specifications (Section 3.3.1) and the Recovery Operations Plan (Section 4.3.1). Since this instrumentation is already in place the reactor vessel flange gamma monitor is not necessary.

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Gamma monitors in the vicinity of the reactor vessel do serve to protect personnel from unexpected dose rate increases, however, the requirements for personnel radiation protection monitors are controlled by other documents and need not be included in the Recovery Operations Plan. We therefore approve the proposed change and are enclosing the amended pages for Recovery Operations Plan Approval No. 25.

Sincerely,

Signed by P. J. Grant for

William D. Travers
Deputy Program Director
THI Program Office

Enclosure: Table 4.3-3

- cc: T. F. Demmitt
- R. E. Rogan
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TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

<u>FUNCTIONAL UNIT</u>	<u>CHANNEL CHECK</u>	<u>CHANNEL CALIBRATION</u>	<u>CHANNEL FUNCTIONAL TEST</u>	<u>MINIMUM CHANNELS OPERABLE</u>	<u>APPLICABILITY</u>	<u>ACTION</u>
1. CONTAINMENT						
a. Reactor Building Purge Sampler (AMS-3)	D	SA	W	1	Note 1	Note 3
b. Reactor Building Equipment Doors (AMS-3)	D	SA	W	1	Note 1	Note 3
2. FUEL HANDLING BUILDING Exhaust Monitors (HPR-221A or HPR-221B)						
a. Gaseous Activity	S	R	M	1	Note 5	Note 6
b. Particulate Activity	S	R	M	1	Note 5	Note 6
3. SDS MONITORS						
a. Process Monitor (IX04)	S	R	M	1	Note 1	Note 4
b. Area Monitor (IX03)	S	SA	M	1	Note 1	Note 2
4. MDHR MONITORS						
a. Area Monitors	S	R	M	3	Note 1	Note 3
b. Ping Monitors	S	R	M	1	Note 1	Note 3

(See following page for notes)
THREE MILE ISLAND - UNIT 2
0172A

TABLE 4.3-3 (Con't)

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

NOTES:

- 1) During operation of the monitored system.
- 2) If monitor becomes inoperable, repair or replace by equivalent equipment within 12 hours. If not completed within 12 hours terminate operation of the monitored system and restore the inoperable monitor(s) to operable status.
- 3) Restore the inoperable monitor(s) to operable status within 72 hours.
- 4) If ion exchange effluent monitor is inoperable, sample on 4 hour frequency for gross beta. If inoperable longer than 24 hours then terminate operation of ion exchange system and restore the inoperable monitor to operable status.
- 5) With radioactive waste in the fuel handling building.
- 6) With the required instrumentation inoperable, suspend all operations involving movement of radioactive waste in the fuel handling building, restore the inoperable equipment to OPERABLE status within 48 hours.
- 7) With the AMS-3 inoperable, close at least one of the Reactor Building Equipment Doors and restore the inoperable equipment to operable status prior to the reopening of both Equipment Doors.

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