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June 26, 1986

NRC/TMI-86-062

Docket No. 50-320

Mr. F.R. Standerfer  
 Vice President/Director  
 Three Mile Island Unit 2  
 GPU Nuclear Corporation  
 P.O. Box 480  
 Middletown, PA 17057

Dear Mr. Standerfer,

Subject: Recovery Operations Plan Change Request No. 35

By letter dated December 16, 1985, GPU Nuclear requested modifications to Tables 4.3-1 and 4.3-7 of the Recovery Operations Plan (ROP) for TMI Unit 2. Further clarification of proposed changes to Table 4.3-1 of the ROP was provided in a discussion with your staff on March 27, 1986. We have completed our review, and we approve the proposed changes as documented in our enclosed safety evaluation. Our approval of your ROP Change Request No. 35 is our Change Approval No. 32. The revised pages of the ROP are also enclosed. These changes shall become effective as of the date of this letter.

original signed by  
 Curt Cowgill for:

William D. Travers, Director  
 TMI-2 Cleanup Project Directorate  
 Office of Nuclear Reactor Regulation

Enclosures: As stated

cc: T. F. Demmitt  
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SAFETY EVALUATION  
BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
FOR RECOVERY OPERATIONS PLAN CHANGE REQUEST 35

INTRODUCTION

By letter dated December 16, 1985, the licensee requested approval for modifications to the TMI-2 Recovery Operations Plan (ROP). This request was supplemented in a discussion with the licensee's staff held on March 27, 1986. These changes involve revisions to Tables 4.3-1 and 4.3-7 of the ROP, as discussed below.

EVALUATION

The licensee proposes to make several changes to Table 4.3-1, to correct administrative errors arising from NRC ROP Change No. 31, issued October 21, 1985 (GPUNR ROP Change Request No. 29). In ROP Change No. 31, the neutron monitoring instrumentation surveillance requirements were listed solely in Table 4.3-1; previously, some requirements were also specified in Table 4.3-7. Consolidating the requirements resulted in some administrative errors to Table 4.3-1. The current request corrects these errors by making the following changes to Table 4.3-1:

- 1) The addition of a note which states "Intermediate and Source Range and Rate is not required at Cabinet 217."
- 2) Changing the frequency of channel checks from once per 12 hours to monthly for Cabinet 217, with a note to that effect. The channel check frequency will remain once per 12 hours for the control room readout channels.

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The first change is necessary because prior to ROP Change No. 31, Table 4.3-7 specified the surveillance requirements for the Intermediate and Source Range Neutron Flux level monitors, including the readout locations in the control room and at Cabinet 217. Table 4.3-1 also specified surveillance requirements for the neutron flux level monitors, and, additionally, the neutron flux rate monitors; however, this table did not identify readout locations. In ROP Change No. 31, Table 4.3-1 was revised to include the neutron flux level monitor readout locations previously listed in Table 4.3-7, however, the neutron flux rate monitors were incorrectly identified as having readout capability at Cabinet 217. This oversight will be corrected by the proposed change.

The second correction to Table 4.3-1 is related to the first. Prior to ROP Change No. 31, Table 4.3-7 required monthly channel checks for the neutron flux level monitors at the control room and Cabinet 217 readout locations. Table 4.3-1 required channel checks every 12 hours for the neutron flux level and rate monitors at the control room readout locations only. The proposed change will restore the monthly channel check frequency for the neutron flux level monitoring instrumentation in Cabinet 217. This frequency is consistent with the original intent of the requirement and will minimize the wear and tear on the equipment in Cabinet 217. The channel check frequency will remain at once per 12 hours for the neutron monitoring instrumentation control room readout locations. These two changes are administrative in nature and will correct discrepancies found in an earlier revision to the ROP, therefore the staff finds them acceptable.

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The licensee also proposes to modify Table 4.3-7 by adding an alternate readout location for Reactor Building Water Level indication. The licensee has installed this alternate level indication, consisting of a probe and level indicating transmitter with readout in the Hot Instrument Shop. The proposed change will improve Reactor Building Water Level monitoring reliability by providing an additional capability for surveillance, thus allowing greater operational flexibility.

The staff concludes that the proposed changes to the ROP do not pose a significant risk to the health and safety of the public and that the proposed changes are within the scope of activities and events analyzed in the PEIS. We therefore approve the proposed changes to the TH1-2 Recovery Operations Plan as discussed herein. Our approval of GPU ROP Change Request No. 35 is NRC ROP Change Approval No. 32.

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Enclosure

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following pages of the TH1-2 Recovery Operations Plan with the enclosed pages as indicated:

4.3-2

4.3-10

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TABLE 4.3-1  
NEUTRON MONITORING INSTRUMENTATION

FUNCTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	TOTAL NO. OF CHANNELS	CHANNELS TO TRIP	MINIMUM CHANNELS OPERABLE	READ OUT LOCATIONS
1. Intermediate Range, Neutron Flux Rate	S/M <sup>(4)</sup>	R <sup>(1)</sup>	M	2	0	1	Cab 217 + (2&3) Control Room
2. Source Range, Neutron Flux and Rate	S/M <sup>(4)</sup>	R <sup>(1)</sup>	M	2	0	2	Cab 217 + (2&3) Control Room

NOTES

- 1) Neutron detectors and all channel components located inside containment may be excluded from CHANNEL CALIBRATION.
- 2) Only one readout required at Cabinet 217.
- 3) Intermediate and Source Range is not required at Cabinet 217.
- 4) Monthly channel check applies only to Cabinet 217.

TABLE 4.3-7

ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

INSTRUMENT		CHANNEL CHECK	CHANNEL <sup>(1)</sup> CALIBRATION	READOUT LOCATION(S)	MINIMUM OPERABLE CHANNELS
1.	Reactor Building Pressure	S	R	Control Room	2
2.	Reactor Vessel Water Level	S/W <sup>(2)</sup>	SA	Control Room(2)	2 <sup>(2)</sup>
3.	Incore Thermocouples/RCS Temperature Detectors	S	R	Control Room or Cable Room	2 <sup>(3)</sup>
4.	Reactor Building Water Level	NA	SA	Control Bldg. Area West or Hot Instrument Shop	1
5.	Borated Water Storage Tank Level	S	R	Control Room	1
6.	Steam Generator Level	NA	NA	NA	1/Generator
7.	Spent Fuel Storage Pool "A" Water Level	S/W <sup>(2)</sup>	SA	Control Room <sup>(2)</sup> or Fuel Handling Bldg.	2 <sup>(2)</sup>
8.	Fuel Transfer Canal (deep end) Water Level	S/W <sup>(2)</sup>	SA	Control Room or Reactor Bldg.	2 <sup>(2)</sup>

(See following page for notes)



# TM1-2 SERVICE LIST

Dr. Thomas Murley  
Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

John F. Wolfe, Esq., Chairman,  
Administrative Judge  
3409 Shepherd St.  
Chevy Chase, MD. 20015

Dr. Oscar M. Paris  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dr. Frederick M. Shon  
Administrative Judge  
Atomic Safety and Licensing  
Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Karin W. Carter  
Assistant Attorney General  
505 Executive House  
P.O. Box 2357  
Harrisburg, PA 17120

Dr. Judith M. Johnsrud  
Environmental Coalition on  
Nuclear Power  
433 Orlando Ave.  
State College, PA 16801

George F. Trowbridge, Esq.  
Shaw, Pittman, Potts and  
Trowbridge  
1800 M. St., NW.  
Washington, D.C. 20036

Atomic Safety and Licensing Board Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Atomic Safety and Licensing Appeal Panel  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Secretary  
U.S. Nuclear Regulatory Commission  
ATTN: Chief, Docketing & Service Branch  
Washington, D.C. 20555

Mr. Larry Hochendoner  
Dauphin County Commissioner  
P.O. Box 1295  
Harrisburg, PA 17108-1295

Fred Rice, Chairperson  
Dauphin County Board of Commissioners  
Dauphin County Courthouse  
Front and Market Streets  
Harrisburg, PA 17101

Dauphin County Office of Emergency  
Preparedness  
Court House, Room 7  
Front & Market Streets  
Harrisburg, PA 17101

U.S. Environmental Protection Agency  
Region III Office  
ATTN: EIS Coordinator  
Curtis Building (Sixth Floor)  
6th & Walnut Streets  
Philadelphia, PA 19106

Thomas M. Gerusky, Director  
Bureau of Radiation Protection  
Department of Environmental Resources  
P.O. Box 2063  
Harrisburg, PA 17120

Dan Kennedy  
Office of Environmental Planning  
Department of Environmental Resources  
P.O. Box 2063  
Harrisburg, PA 17120

Willis Blaby, Site Manager  
U.S. Department of Energy  
P.O. Box 88  
Middletown, PA 17057-0311

David J. McGoff  
Division of Three Mile Island Programs  
NE-23  
U.S. Department of Energy  
Washington, D.C. 20545

William Lochstet  
104 Davey Laboratory  
Pennsylvania State University  
University Park, PA 16802

Randy Myers, [editorial]  
The Patriot  
812 Market St.  
Harrisburg, PA 17105

Robert B. Borsum  
Babcock & Wilcox  
Nuclear Power Generation Division  
Suite 220  
7910 Woodmont Ave.  
Bethesda, MD. 20814

Michael Churchill, Esq.  
PILCOP  
1315 Walnut St., Suite 1632  
Philadelphia, PA 19107

Linda W. Little  
5000 Hermitage DR.  
Raleigh, NC 27612

Marvin J. Lewis  
6504 Bradford Terrace  
Philadelphia, PA 19149

Jane Lee  
183 Valley Rd.  
Ebers, PA 17319

Bishop, Lieberman & Cook  
ATTN: J. Lieberman, Esquire  
1155 Avenue of the Americas  
New York, New York 10036

Walter W. Cohen, Consumer Advocate  
Department of Justice  
Strawberry Square, 14th Floor  
Harrisburg, PA 17127

Edward O. Swartz  
Board of Supervisors  
Londonderry Township  
RFD #1 Geyers Church Rd.  
Middletown, PA 17057

Robert L. Knupp, Esquire  
Assistant Solicitor  
Knupp and Andrews  
P.O. Box P  
407 N. Front St.  
Harrisburg, PA 17108

John Levin, Esquire  
Pennsylvania Public Utilities Comm.  
P.O. Box 3265  
Harrisburg, PA 17120

Mr. Edwin Kintner  
Executive Vice President  
General Public Utilities Nuclear Corp.  
100 Interpace Parkway  
Partispany, NJ 07054

Ad Crable  
Lancaster New Era  
8 West King Street  
Lancaster, PA 17601