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Docket No. 50-320

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

Dear Mr. Standerfer:

Subject: Recovery Operations Plan Change No. 35

Reference: Letter from F. R. Standerfer to W. D. Travers, 4410-86-L-0129

dated August 18, 1986 (ROP Change Request 39)

The referenced letter proposed additions to the Recovery Operations Plan requirements to include calibration and operability requirements of additional criticality monitors in the reactor building. The change was submitted to support defueling operations.

Based on our enclosed safety evaluation we have concluded that the proposed changes will not present an undue risk to the health and safety of the public. We therefore approve the proposed changes and are enclosing the amended pages for Recovery Operations Plan Change No. 35.

Sincerely,

ORIGINAL SIGNED BY:

B609170358 860911 William D. Travers
PDR ADDCK 05000320 Director
P PDR TMI-2 Cleanup Project Directorate

Enclosure: As stated

cc: T. F. Demmitt R. E. Rogen J. E. Frew S. Levin J. J. Byrne

A. W. Miller Service Distribution List (see attached)

> JMICHO. .s. Wothers 9/1/86

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ATTACHMENT

SAFETY EVALUATION

Introduction

During defueling the licensee intends to place end fittings in shielded 55 gallon drums which will be inside an overpack container. The drums will be transferred to and placed in a storage area adjacent to the west "D" ring on the 347 ft. elevation of the reactor building. As tooling and methodologies are developed the end fittings will be sized to fit through the openings in defueling canisters and ultimately transferred offsite. There may be some fuel attached to or packed in flow spaces in the end fittings. Since the accumulated fuel contained in a drum or several drums could exceed 450 grams of combined uranium-235, uranium-233 and plutonium criticality monitoring is required per 10 CFR 70.24.

Evaluation

The licensee proposed to add two criticality monitors to cover the end fitting storage area. The monitors meet the requirements of 10 CFR 70.24. The attached surveillance requirements for these detectors are the same as the surveillance requirements for the existing criticality monitors in the reactor and fuel handling building and are the same as the surveillance requirements in the standard B&W Technical Specifications (NUREG 0103).

Conclusion

The proposed monitoring system meets the requirements of 10 CFR 70.24. The monitoring system will enhance safety by alerting personnel if a criticality event were to occur. The change will not result in any environmental effects and falls within the scope of activities previously considered in the Programmatic Environmental Impact Statement.

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

NOTES:

- 11. During either of the following operations:
 - a. Handling of canisters containing core material.
 - b. Handling of any heavy load over canisters containing core materials.
- 12. With less than one channel operable, terminate the following operations:
 - a. Handling of canisters containing core material. *
 - b. Handling of any heavy load over canisters containing core material.
- 13. With the required monitor inoperable, secure the ventilation system and suspend all operations involving movement of radioactive materials or generation of airborne contamination until the inoperable monitor is restored to operable status.
- 14. During periods when personnel are in the containment and end fittings are being transferred to or stored in their designated location outside the Reactor Vessel.
- 15. With less than one channel operable, terminate the following operations:
 - a. Handling of end fitting storage containers outside the Reactor Vessel.**
 - Handling of any heavy load over the end fitting storage container area.
- * This shall not prohibit placing a canister in transit in a safe storage location.
- **This shall not prohibit placing amend fitting storage container in transit in a safe storage location.

TABLE 4.3-3 (Cont'd)

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

FUN	CTIONAL UNIT	CHANNEL CHECK	CHANNEL CALIBRATION	CHANNEL FUNCTIONAL TEST	CHANNELS OPERABLE	APPLICABILITY	ACTION	
5.	FUEL TRANSFER CANAL						•	
	a. Criticality Monitor	S	R	м '	1	Note 11	Note 12	
6.	FUEL POOL "A"							
	a. Criticality Monitor	S	R	М	1	Note 11	Note 12	
7.	FUEL HANDLING BUILDING TRUCK BAY							
	a. Criticality Monitor	S	R	М	1	Note 11	Note 12	
8.	WASTE HANDLING AND PACKAGING FACILITY							
	a. Exhaust Monitor	D	SA	W	1	Note 1	Note 13	
9.	REACTOR BUILDING							
	a. End Fitting Storage Area Criticality Monito	s	R	М	1	Note 14	Note 15	

(See following pages for Notes.)

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