

Distribution:
Docket No. 50-320

January 21, 1983

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Docket No. 50-320

Mr. B. K. Kanga, Director
Three Mile Island Unit 2
GPU Nuclear Corporation
P.O. Box 480
Route 441 South
Middletown, PA 17057

Dear Mr. Kanga:

SUBJECT: GENERAL PROJECT DESIGN CRITERIA, REVISIONS 2 AND 3

REFERENCE: GPU letter from Kanga to Barrett, 4410-82-L-0046,
dated November 11, 1982

We have reviewed your Revisions 2 and 3 of the General Project Design
Criteria (GPDC) as forwarded in the referenced letter. These comments
should be resolved before Revision 3 is made effective.

Sincerely,

/s/

Bernard J. Snyder, Program Director
Three Mile Island Program Office
Office of Nuclear Reactor Regulation

Enclosures: NRC Comments on General
Design Criteria, Rev. 2 & 3

cc: J. Barton
L. King
J. Byrne
Service List (see attached)

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NRC COMMENTS ON
GENERAL PROJECT DESIGN CRITERIA
REVISIONS 2 and 3

<u>Section</u>	<u>Comment</u>
2.5	Safety-related should not be limited to permanent plant features. The Mini-Decay Heat Removal System has operability requirements in the Proposed Tech Specs and should be interpreted as being safety related. Also, future systems may be installed that are not permanent but are safety related. Delete the word <u>permanent</u> .
2.6	Items that assure the integrity of the reactor coolant pressure boundary but are not required to maintain the plant in a safe shutdown condition should be item "d." Examples would be the Standby Pressure Control System and SDS when in the RCS processing mode.
3.2.7	It was agreed per your Documentation of Verbal Communication Form dated August 31, 1982 (Byrne to Lynch) that words should be added to this section stating that the river flow rate for assessing actual releases from TMI-2 should be obtained exclusively from the USGS gaging station at Harrisburg, PA. This requirement should be added as paragraph 3.2.8.
3.4.1 (L)	The Appendix R criteria should be retained. Exemption has not to date been granted and even when approved, it will apply only to certain requirements of Appendix R.
<u>Table 1</u>	
Item 3	Justify the deletion of Reg. Guide 1.26 (Quality Group Classifications).
Item 4	Justify the deletion of Reg. Guide 1.29 (Seismic Design Classification).
Item 7	Justify the deletion of Reg. Guide 1.63 (Electrical Penetration Assemblies in Containment.....).
Item 10	Justify the deletion of Reg. Guide 1.111 (Methods for Estimating Atmospheric Transport and Dispersion of Gaseous Effluents.....).

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