



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

January 21, 1980 NRC/TMI-80-011

Docket No. 50-289 50-320

> Mr. R. C. Arnold Senior Vice President Metropolitan Edison Company 100 Interpace Parkway Parsippany, NJ 07054

Dear Mr. Arnold:

Subject: TMI-1 Liquid Waste Storage Capacity

In a letter from J. G. Herbein to R. Vollmer (TLL-001) dated January 11, 1980, Met-Ed requested that the NRC concur on the use of the available tankage (two empty reactor coolant bleed tanks) in Unit 1 for temporary storage of water from Unit 2 borated water storage tank (BWST). The tankage in Unit 1 (two empty reactor coolant bleed tanks) is a requirement resulting from the Commission Order related to the operation of EPICOR II, should a contingency require additional site storage capacity. In your letter of January 11, you contend that the storage capacity created by the transfer of water from the Unit 2 BWST to the Unit 1 bleed tanks satisfies the intent of the Commission Order for the operation of EPICOR II. However, it is our contention that the Commission Order requires that shielded storage tanks (located inside a building for secondary containment) be maintained for contingency purposes. For example, if it became necessary (e.g. liquid leakage out of containment) to transfer reactor building sump water out of the reactor building, the capacity in the Unit 2 BWST could not be used for storage of such water, due to the lack of adequate shielding. In addition, our approval of your request to reduce the Unit 2 BWST level to a minimum of 100,000 gallons was based upon an understanding, as stated in our letter of December 18, 1979, (J. Collins to R. Wilson), that the BWST would subsequently be refilled with EPICOR II processed water. We do not find acceptable your reasoning that the Unit 2 BWST provides equivalent storage to the Unit 1 bleed tanks and, therefore, cannot concur with your request for temporary use of the Unit 1 bleed tanks. We would be receptive to review any alternative proposals which do not conflict with the Commission Order.

> J. T. Collins, Deputy Director NRC/TMI Technical Support Staff

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