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July 13, 1983
 4410-83-L-0140

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 U.S. NUCLEAR
 REGULATORY COMMISSION

TMI Program Office
 Attn: Mr. L. H. Barrett
 Deputy Program Director
 US Nuclear Regulatory Commission
 c/o Three Mile Island Nuclear Station
 Middletown, PA 17057-0191

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
 Operating License No. DPR-73
 Docket No. 50-320
 Reserve Waste Water Tankage

This letter is being submitted to inform you of GPUNC's proposal to change the reserve tankage requirement. License Amendment Request No. 3 (4410-83-L-0084 dated May 27, 1983) which requested deletion of the waste water tankage requirement is currently awaiting NRC approval. On July 18, 1983, it is our intention to remove the Upper and Lower Tank Farms from the required reserve waste water tankage due to scheduled activities as part of the "A" Pool Refurbishment Program. Thus, we are proposing that, until the Amendment Request is approved, GPUNC maintain a minimum of 100,000 gallons freeboard between the following tanks:

- 1) EPICOR II Clean Water Receiving Tank (CC-T-2)
130,000 gallon capacity
- 2) EPICOR II Off Spec Water Receiving Batch Tank (CC-T-1)
85,000 gallon capacity
- 3) "A", "B", and "C" Reactor Coolant Bleed Tanks (RCBT's)
74,000 gallon capacity each
- 4) Miscellaneous Waste Holdup Tank (MWT)
19,000 gallon capacity

The advantages to designating the above six tanks as reserve tankage are as follows:

- o Greater flexibility during Reactor Coolant System (RCS) processing

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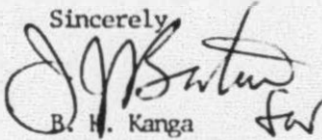
- The combined capacity of all six tanks (approximately 408,000 gallons) allows approximately 200,000 gallons freeboard after RCS draindown. This is twice the amount of freeboard required.
- Calculations demonstrate that the greatest radiation exposure rate would be 0.114 mr/hr at the Protected Area fence. These calculations are based for CC-T-2 holding 100,000 gallons of Reactor Building (RB) Sump Water and Cs-137 and Cs-134 concentrations of 2.670 $\mu\text{Ci/ml}$ and 0.168 $\mu\text{Ci/ml}$ respectively. This estimate is much less than the 0.8 mr/hr requirement for a radiation area.

In addition to the above, further reasoning for designating Tanks CC-T-2 and CC-T-1 as reserve tankage is as follows:

- Use of Tanks CC-T-1 and CC-T-2 will impact RCS draindown and EPICOR II processing the least of available options;
- The ability to employ two pumps in series (RB sump pump SWS-P-1 and the EPICOR II pump ALC-P-5) as opposed to only one pump with the MWT or RCBT's is advantageous;
- Use of the EPICOR II tanks would decrease the chances of system cross-contamination due to:
 - i) No chemical contamination in the bleed tanks, and
 - ii) No deboration of the "A" and "C" RCBT's
- Processing of CC-T-1 or CC-T-2 will be a hard pipe transfer.

If you have any questions, please contact Mr. J. J. Byrne of my staff.

Sincerely



B. H. Kanga
Director, TMI-2

BKK/RDW/jep

CC: Dr. B. J. Snyder, Program Director - TMI Program Office