



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

February 27, 2014

Mr. Michael J. Pacilio  
President and Chief Nuclear Officer  
Exelon Nuclear  
4300 Winfield Road  
Warrenville, IL 60555

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - REQUEST FOR  
ADDITIONAL INFORMATION REGARDING PROPOSED LICENSE  
AMENDMENT REQUEST TO REVISE TECHNICAL SPECIFICATION  
REPORTING REQUIREMENTS (TAC NO. MF0628)

Dear Mr. Pacilio:

By letter dated February 4, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13037A051), Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The LAR relates to the proposed deletion of various reporting requirements that are encompassed in the current TMI-1 Technical Specifications.

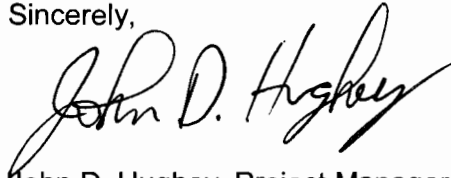
The Nuclear Regulatory Commission staff has determined that additional information is needed to complete its review of the submittal. The specific questions are found in the enclosed request for additional information (RAI). The questions were sent in draft form via electronic transmission on January 29, 2014 (ADAMS Package No. ML14030A565), to Ms. Wendy Croft, of your staff. The draft questions were sent to ensure that the questions were understandable, the regulatory basis was clear, and to determine if the information requested was previously docketed. The questions were discussed with Ms. Stephanie Hanson, of your staff, on February 6, 2014, resulting in revisions to the draft RAIs. The revised RAIs are provided in the enclosure. In addition, the NRC staff and Exelon representatives agreed that a response to this RAI would be provided within 30 days of the date of this letter.

M. Pacilio

- 2 -

Please contact me at 301-415-3204, if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "John D. Hughey". The signature is written in a cursive style with a large, looping initial "J".

John D. Hughey, Project Manager  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:  
Request for Additional Information

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

EXELON GENERATION COMPANY, LLC

PROPOSED REVISION TO PRESSURE AND TEMPERATURE LIMIT CURVES AND  
EXEMPTION REQUEST FOR INITIAL REFERENCE TEMPERATURE VALUES

DOCKET NO. 50-289

By letter dated February 4, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13037A051), Exelon Generation Company, LLC (Exelon, the licensee), submitted a License Amendment Request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The LAR relates to the proposed deletion of various reporting requirements that are encompassed in the current TMI-1 Technical Specifications (TSs). In order for the U.S. Nuclear Regulatory Commission (NRC) staff to complete its review of the LAR, a response to the following Requests for Additional Information (RAIs) is requested.

1. The LAR proposes deletion of TS 6.9.1.B.5, “. . . specific activity analysis in which the primary coolant exceeded limits of [TS] 3.1.4.1 . . .” As justification for this change, the LAR specifies:

TMI, Unit 1, TS 6.9.1.B.5 requires annual reporting of the results of specific activity analysis in which the primary coolant exceeds the limits of TS 3.1.4.1. However, specific activity analysis pertaining to primary coolant limits is reported to the NRC by means of the PI [Performance Indicator] Program, under the Reactor Oversight Program (ROP). As part of the ROP PI Program, TMI, Unit 1 currently provides monthly reactor coolant specific activity data on a quarterly basis to the NRC in accordance with Regulatory Issue Summary (RIS) 2000-08, Revision 1, “Voluntary Submission of Performance Indicator Data,” [Reference 8 of the LAR] following the guidelines provided in NEI 99-02, “Regulatory Assessment Performance Indicator Guideline” [Reference 9 of the LAR].

The reactor coolant specific activity concentration is provided more frequently than required by the TS, regardless of whether or not the TS limit is exceeded. Additionally, if the limit is exceeded, this would be evaluated within the corrective action program, which would drive a determination of the cause and identify appropriate corrective actions to prevent recurrence. Therefore, annual reporting of specific activity analysis in accordance with TS 6.9.1.B.5 is no longer warranted.

REQUEST FOR ADDITIONAL INFORMATION

RAI-1      The NRC staff concurs that the reactor coolant specific activity data is reported to the NRC via the PI program under the ROP. While the PI

Enclosure

program reports reactor coolant specific activity, it does not report all of the information contained in TS 6.9.1.B.5, under the circumstances where activity exceeds the limits of TS 3.1.4.1. Therefore, please provide justification for all of the proposed deletions under this TS section.

2. The licensee proposes to delete TS 6.17, "Major Changes to Radioactive Waste Treatment Systems." The licensee states:

The radioactive waste treatment systems (gaseous, liquid and solid) are described in chapter 11 of the TMI, Unit 1 Updated Final Safety Analysis Report (USFAR). Major changes to the radioactive waste treatment systems would require an evaluation in accordance with 10 CFR [Title 10 of the *Code of Federal Regulations*, Section] 50.59, "Changes, tests, and experiments." If the changes are significant enough to be evaluated against the eight criteria specified in 50.59(c)(2), but do not require prior NRC approval, then a summary of the changes must be provided to the NRC in accordance with 50.59(d)(2), which states that "the licensee shall submit...a report containing a brief description of any changes, tests, and experiments, including a summary of the evaluation of each. A report must be submitted at intervals not to exceed 24 months." Major changes to radioactive waste treatment systems will be reported to the NRC via compliance with 10 CFR 50.59, and therefore, annual reporting is no longer warranted. Accordingly, this proposed change to delete TS 6.17 does not alter or change any existing reporting obligations required by 10 CFR and maintains consistency with applicable regulatory requirements.

#### **REQUEST FOR ADDITIONAL INFORMATION**

- RAI-2      Are significant changes to the radioactive waste treatment systems reported in the TMI annual effluent report? If not, please supplement the LAR with a statement that the TMI Updated Final Safety Analysis Report will be revised to include these changes in the annual effluent report.

