



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

March 21, 2011

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 RELOCATION OF
EQUIPMENT LOAD LIST FROM THE TECHNICAL SPECIFICATIONS TO A
LICENSEE CONTROLLED DOCUMENT (TAC NO. ME4732)

Dear Mr. Pacilio:

By letter dated September 22, 2010 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML102650392), Exelon Generation Company, LLC (Exelon, the licensee) submitted a license amendment request (LAR) proposing to revise the Technical Specifications (TSs) for Three Mile Island Nuclear Station, Unit 1. The proposed changes would relocate the equipment load list from TS 4.5.1.1.b to the Updated Final Safety Analysis Report.

The Nuclear Regulatory Commission staff has been reviewing the submittal and has determined that additional information is needed to complete its review. The specific questions are found in the enclosed request for additional information (RAI). The questions were sent via electronic transmission on February 22, 2011, to Mr. Frank Mascitelli, 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 was previously docketed. The draft questions were discussed in a teleconference with your staff on February 25, 2011. After the teleconference was held, the first two questions in the original draft RAI were combined into one question and sent to Mr. Mascitelli in draft form on March 3, 2011. The final version of the RAI questions is enclosed. It was agreed that a response to this RAI would be submitted by April 7, 2011.

Please contact me at 301-415-2833, if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Peter Bamford".

Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:
As stated

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REQUEST FOR ADDITIONAL INFORMATION
THREE MILE ISLAND NUCLEAR STATION, UNIT 1
PROPOSED TECHNICAL SPECIFICATION CHANGES REGARDING
RELOCATION OF EQUIPMENT LOAD LIST FROM TECHNICAL SPECIFICATIONS
TO A LICENSEE CONTROLLED DOCUMENT
DOCKET NO. 50-289

By letter dated September 22, 2010 (Agencywide Documents Access and Management System Accession No. ML102650392), Exelon Generation Company, LLC (the licensee), submitted a license amendment request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The licensee proposes to relocate the equipment load list from Technical Specification (TS) 4.5.1.1.b, to the Updated Final Safety Analysis Report (UFSAR). In order for the NRC staff to complete its review of the LAR, a response to the following request for additional information is requested.

1. Title 10 of the *Code of Federal Regulations* (10 CFR) Section 50.36(b) states, in part: "The technical specifications will be derived from the analysis and evaluation included in the safety analysis report, and amendments thereto, submitted pursuant to §50.34." The LAR presents a brief description of how the requested changes meet the requirements of 10 CFR 50.36(c)(2)(ii), however it does not explain how relocating the equipment list back to the document from which TS is derived will comply with the above 10 CFR 50.36(b) requirement(s). Additionally, TSs are required to contain surveillance requirements in accordance with the requirements at 10 CFR 50.36(c)(3) which states: "Surveillance requirements are requirements relating to test, calibration, or inspection to assure that the necessary quality of systems and components is maintained, that facility operation will be within safety limits, and that the limiting conditions for operation will be met."

Please explain how the surveillance will continue to ensure that the safety-related equipment proposed for relocation from the TS to the UFSAR will continue to be able to perform the specified safety functions and how continued compliance with 10 CFR 50.36(b) is met. The response should include, but not be limited to, an explanation of how the revised TS will ensure that all equipment described in TMI-1 UFSAR Chapter 14, which depends on the sequencer, will be properly tested.

2. In the LAR, Attachment 1, Section 4.3, the LAR states that the proposed changes are consistent with Standard Technical Specifications (STS), NUREG-1430, "Standard Technical Specifications Babcock and Wilcox Plants." Section 3.0 of Attachment 1 states that the proposed changes are consistent with STS

Enclosure

surveillance test requirements contained in SR 3.8.1.19 and SR 3.8.1.11. The LAR further states that while the performance of the Sequence and Power Test meets the criteria of 10 CFR 50.36(c)(2)(ii) for inclusion in the TS, the listing of equipment being relocated provides little or no safety benefit. However, the proposed relocation of the equipment load list does not include a high level description, in the TS, of the loads that the test is designed to cover, leaving very little description to ensure compliance with 10 CFR 50.36(c)(3). Such a high level description is provided in NUREG-1430, which includes reference to energizing permanently connected Emergency Diesel Generator loads and energizing auto-connected emergency/shutdown loads through the automatic load sequencer. Such a description would be needed to be consistent with the referenced STS, as the application purports.

Please provide an updated version of the proposed TS with a high level description of the equipment load list in the surveillance or provide justification as to why it is not provided.

March 21, 2011

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 RELOCATION OF EQUIPMENT LOAD LIST FROM THE TECHNICAL SPECIFICATIONS TO A LICENSEE CONTROLLED DOCUMENT (TAC NO. ME4732)

Dear Mr. Pacilio:

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Sincerely,

/RA/

Peter Bamford, Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure: As stated

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