



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

September 4, 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 LICENSE AMENDMENT REQUEST
TO ELIMINATE CERTAIN 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), supplemented by letter dated March 24, 2014 (ADAMS Accession No. ML14084A270), Exelon Generation Company, LLC (Exelon or the licensee), submitted a license amendment request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The LAR relates to proposed deletion of reporting requirements for certain plant activities.

The Nuclear Regulatory Commission staff has been reviewing the response 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 August 14, 2014, to Mr. Richard Gropp of your staff. The draft questions were sent to ensure that the questions were understandable, the regulatory basis for the questions was clear, and to determine if the information was previously docketed. The draft questions were discussed in a teleconference with your staff on August 27, 2014. It was agreed that a response to this RAI would be submitted by September 30, 2014.

Please contact me at 301-415-3100, if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John G. Lamb".

John G. Lamb, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure:
As stated

cc: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION
PROPOSED DELETION OF CERTAIN TECHNICAL SPECIFICATION
REPORTING REQUIREMENTS
EXELON GENERATION COMPANY, LLC
THREE MILE ISLAND NUCLEAR STATION, UNIT 1
DOCKET NO. 50-289

By letter dated February 4, 2013 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML13037A051), supplemented by letter dated March 24, 2014 (ADAMS Accession No. ML14084A270), Exelon Generation Company, LLC (Exelon or the licensee), submitted a license amendment request (LAR) for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The LAR relates to proposed deletion of reporting requirements for certain plant activities.

The U.S. Nuclear Regulatory Commission (NRC) staff has been reviewing the response and has determined that additional information is needed to complete its review. The specific questions are below.

Regulatory Basis

The regulations in Section 50.36, "Technical Specifications," of Title 10 of the *Code of Federal Regulations* (10 CFR) requires that each applicant for a license authorizing operation of a nuclear power plant include, in its application, proposed technical specifications (TSs). These TSs, as issued by the NRC, are incorporated into the facility operating license as Appendix A. Specifically, 10 CFR 50.36(c)(5) requires that the Administrative Controls Section of TSs include reporting requirements that assure operation of the facility in a safe manner.

Background

One of the proposed deletions relates to TS 6.9.1.B.3 regarding annual reporting of periodic Leak Reduction Program Tests. The licensee provides the following explanation for deletion of this requirement:

By letter dated April 28, 1982, the NRC issued Amendment No. 77 for TMI, Unit 1 (Reference 5) [ADAMS Accession No. ML003763983]. This amendment added the requirement to report the results of the periodic leak reduction program testing on the basis that it satisfied the guidance provided in NUREG-0737, Item III.D.1.1 (Reference 6) [ADAMS Accession No. ML102560051]. Item III.D.1.1 specifies that the results of the initial leak test performed under the leak reduction program for systems outside containment be submitted to the NRC. Although Item III.D.1.1 does require on-going periodic leak tests, it does not indicate that the periodic test results be submitted to the NRC. In addition, the results of the tests performed on systems outside of primary containment are readily available

to the NRC for inspection by the NRC Resident Inspectors. Significant leakage identified would be captured in the corrective action program which would drive a determination of cause and action to prevent reoccurrence; therefore, annual reporting is no longer warranted.

Item III.D.1.1, "Primary Coolant Sources Outside Containment," in NUREG-0737, "Clarification of TMI Action Plan Requirements," concerns implementation of a TS-required program to reduce leakage from systems outside containment that would or could contain highly radioactive fluids during a serious transient or accident to as-low-as-practical levels. The NRC staff concurs with the licensee that the program does not indicate that the periodic test results be submitted to the NRC. However, NUREG-0737 recommends that a program should be specified in a licensee's TSs. For Babcock and Wilcox plants, such as TMI-1, the program is currently specified in Standard Technical Specifications NUREG-1430, Revision 4.

A NRC staff's review of the licensee's current TSs, as well the Updated Final Safety Analysis Report, determined that the licensing basis for TMI-1 does not address such a program.

REQUEST FOR ADDITIONAL INFORMATION

The Periodic Leak Reduction Program is not currently specified in the TSs for TMI-1. Is the Periodic Leak Reduction Program described in the licensing basis? If so, please describe. If not, why not and describe where the Periodic Leak Reduction Program is maintained and controlled in TMI-1 documents? Please explain how the TMI-1 commitment for the Periodic Leak Reduction Program will continue to be met upon the proposed deletion of the subject TS reporting requirements.

September 4, 2014

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Sincerely,

/RA/

John G. Lamb, Senior Project Manager
Plant Licensing Branch I-2
Division of Operating Reactor Licensing
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ADAMS Accession Number: ML14240A412 *via memo **via e-mail

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