



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

August 18, 2015

MEMORANDUM TO: Douglas A. Broaddus, Chief  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

FROM: Robert L. Gladney, Project Manager *Robert L. Gladney*  
Plant Licensing Branch I-2  
Division of Operating Reactor Licensing  
Office of Nuclear Reactor Regulation

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 1 - DRAFT  
REQUEST FOR ADDITIONAL INFORMATION (TAC NO. MF6504)

The enclosed draft request for additional information (RAI) was transmitted on August 17, 2015, to Mr. David Helker and Mr. Frank Mascitelli of Exelon Generation Company, LLC (Exelon, the licensee). This information was transmitted to facilitate an upcoming conference call in order to clarify the licensee's amendment request for Three Mile Island Nuclear Station, Unit 1 (TMI-1), dated July 23, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15204A843), as supplemented by letter dated July 28, 2015 (ADAMS Accession No. ML15209A960). The proposed amendment would modify technical specification requirements to allow for the temporary connection of the borated water storage tank to non-seismic piping for cleanup and recirculation to support activities associated with the TMI-1 Fall 2015 Refueling Outage and Fuel Cycle 21 operation.

The draft RAI was sent to Exelon to ensure that the questions are understandable, the regulatory basis for the questions is clear, there is no proprietary or sensitive information contained in the draft RAI that should be withheld from the public, and to determine if the information was previously docketed. This memorandum and the enclosure do not convey or represent a U.S. Nuclear Regulatory Commission staff position regarding the licensee's request.

On August 18, 2015, Mr. Helker indicated that a conference call was not required and that a response to the RAI would be provided by August 26, 2015.

Docket No. 50-289

Enclosure:  
Draft RAI

cc w/enclosure: Distribution via Listserv

REQUEST FOR ADDITIONAL INFORMATION  
LICENSE AMENDMENT REQUEST FOR THE TEMPORARY RESTORATION OF  
BORATED WATER STORAGE TANK CLEANUP AND RECIRCULATION OPERATION  
EXELON GENERATION COMPANY, LLC  
THREE MILE ISLAND NUCLEAR STATION, UNIT 1  
DOCKET NO. 50-289

By letter dated July 23, 2015 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML15204A843), as supplemented by letter dated July 28, 2015 (ADAMS Accession No. ML15209A960), Exelon Generation Company, LLC (Exelon, the licensee) requested an amendment to Facility Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1 (TMI-1). The proposed amendment would modify technical specification (TS) requirements to allow for the temporary connection of the borated water storage tank (BWST) to non-seismic piping for cleanup and recirculation to support activities associated with the TMI-1 Fall 2015 Refueling Outage and Fuel Cycle 21 operation.

The U.S. Nuclear Regulatory Commission staff has reviewed Exelon's application and, based upon this review, determined that further information is needed to complete our evaluation of the proposed change. The following information is requested:

As part of the license amendment request (LAR), the licensee proposed the addition of the following two notes to TS 3.3.1.1(a):

1. The BWST piping may be unisolated from seismic Class II Cleanup path piping for a total duration of not more than 720 hours prior to the scheduled start of the Fall 2015 Refueling Outage and for a total duration of not more than 1440 hours during the following Fuel Cycle 21 operation under administrative and design controls for filtration and/or demineralization of the tank contents.
2. The BWST piping may be unisolated from seismic Class II Recirculation path piping to perform weekly (and after each makeup) BWST boron concentration surveillance testing until the end of Fuel Cycle 21 operation.

The proposed notes would allow the licensee to connect the BWST to seismic Class II piping when it is required to be operable in accordance with TSs through Fuel Cycle 21. The two circumstances when this physical configuration will be implemented include cleanup and surveillance operations. The first note provides a cumulative time the system will be maintained in a cleanup configuration, and it states that the cleanup operation will be performed under administrative and design controls. In contrast, the second note pertaining to surveillance testing does not provide a time constraint, and it does not identify the administrative and design controls as being required.

Enclosure

**Technical Specifications Branch (STSB)-Request for Additional Information (RAI)-1**

1. The LAR states that approximately 30 hours per week of surveillance testing will be performed, but a time constraint is not identified in the associated note (i.e., the second note that will be added to TS 3.3.1.1(a)). Revise this note to include a time constraint (e.g., cumulative time or time required to perform the surveillance testing) or justify why a time limit is unnecessary.

**STSB RAI-2**

2. The LAR states that surveillance testing will be performed under administrative and design controls, but this language is not reflected in the associated note (i.e., the second note that will be added to TS 3.3.1.1(a)). Revise this note to include the language that the surveillance testing configuration will be performed under administrative and design controls or justify why this language is unnecessary.

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**ADAMS Accession No.: ML15230A533**

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