

POOR ORIGINAL

FILE:

FROM: Metropolitan Edison Company Reading, Pa. R. C. Arnold		DATE OF DOC 6-19-74	DATE REC'D 6-25-74	LTR X	TWX	RPT	OTHER
TO: Paul C. Bender		ORIG 1	CC	OTHER	SENT AEC PDR XXX SENT LOCAL PDR XXX		
CLASS	UNCLASS	PROP INFO	INPUT	NO CYS REC'D 1	DOCKET NO: 50-289		
	XXX						

DESCRIPTION:

Ltr requesting EXEMPTION from submission of
ECCS evaluation.....

ENCLOSURES:

**ACKNOWLEDGED
DO NOT REMOVE**

PLANT NAME: THREE MILE ISLAND UNIT #1

FOR ACTION/INFORMATION 6-25-74 GMC

BUTLER (L)	SCHWENCER (L)	ZIEMANN (L)	REGAN (E)
W/ CYS	W/9 CYS	W/ CYS	W/ CYS
CLARK (L)	STOLZ (L)	DICKER (E)	
W/ CYS	W/ CYS	W/ CYS	W/ CYS
PARR (L)	VASSALLO (L)	KNIGHTON (E)	
W/ CYS	W/ CYS	W/ CYS	W/ CYS
IGNIEL (L)	PURPLE (L)	YOUNGBLOOD (E)	
W/ CYS	W/ CYS	W/ CYS	W/ CYS

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Sent to Lic Carl Goulbourne 6-25-74

POOR ORIGINAL



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 9000

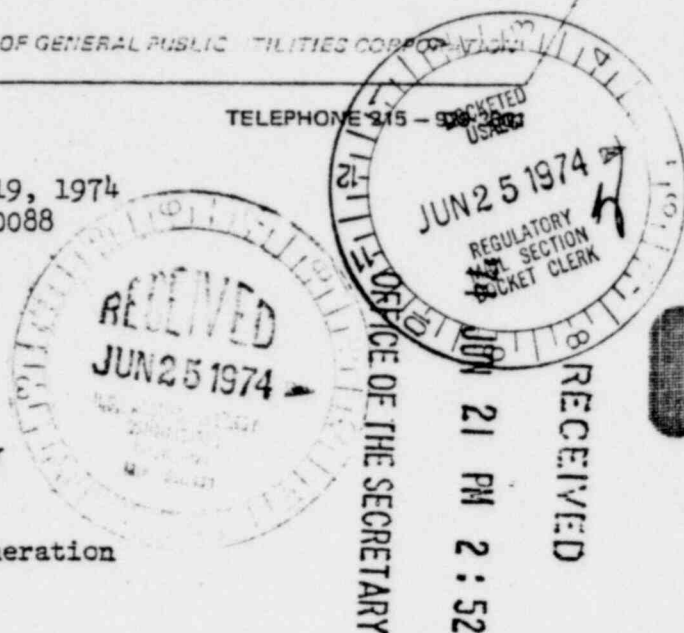
June 19, 1974
GQM 0088

REGULATORY DOCKET FILE COPY

United States Atomic Energy Commission
Washington, D.C. 20545

Attention: Mr. Paul C. Bender, Secretary

Subject: Metropolitan Edison Company
Three Mile Island Nuclear Generation
Station Unit 1
Docket No. 50-289



Dear Dr. Ray and Members of the Commission:

The implementation schedule (set out in 10 CFR 50.46) for the recently adopted ECCS Acceptance Criteria requires submission of the appropriate evaluation models and analyses for ECCS systems on operating reactors prior to August 5, 1974 (or such later date allowed by the Director of Regulation in conjunction with an approved extension). That implementation schedule also provides that a request for an exemption from the operating requirements which otherwise obtain for each facility upon submission of its ECCS evaluation, shall be submitted not less than 45 days prior to the date established for submission of the evaluation itself, i.e., by June 20, 1974. As explained below, there is not presently available to Met-Ed sufficient information to allow it now to determine whether compliance with Appendix K can be achieved at Three Mile Island Unit 1 without imposing operating restrictions on that unit. We, therefore, are unable to determine whether the need to submit an ECCS exemption request will lie at all, much less presently make the showing and provide the information required to support such an exemption request. In order to preserve the opportunity to make this request, if it is shown to be necessary, when sufficient information is available to make the determination, we request that the Commission relieve Met-Ed from so much of Section 50.46 (a) (2) (vi) as would require submission by June 20, 1974, of an ECCS exemption request for the Three Mile Island Nuclear Generating Station Unit 1.

Under 50.46 (a) (2) (vii) an exemption request must show that it would be in the public interest to allow the licensee a specified additional period of time within which to alter the operation of the facility in accordance with submittal of the evaluations and analyses required by that section. The request also should include a discussion of the alternatives available for establishing compliance with the Acceptance Criteria (Appendix K to 10 CFR Part 50). A request, then, should include a discussion of the solutions considered by a licensee to

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6/24 To Public Proceedings Branch for appropriate action
Copies to Mr. Grant, Solicitor and DR. No enclosure received.

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Rec'd Off. Dir. of Reg.
Date 6/24/74
Time 4:10

June 19, 1974

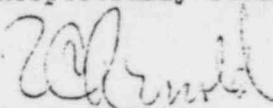
gain compliance with Appendix K, and as a result of the selection of one of these alternatives, the schedule for actual implementation of a solution.

Met-Ed, by letter of this same date (copy attached), is requesting from the Director of Regulation an extension of the period established for submittal of the ECCS analyses. The extension request indicates that Met-Ed has not yet received from the vendor of the NSSS system and fuel used at Three Mile Island Unit 1 either the core blowdown analysis or the fuel performance analysis, will not have completed its detailed ECCS evaluation until September, 1974, and until that time will not have finally determined whether any operating restrictions will be appropriate for Three Mile Island Unit 1. Until we are able to make this threshold determination, and (if restrictions are called for) fix the amount of any derating which may be required, then it is not possible for us to make a responsible submittal to you regarding the extent of the public interest in terms of loss of electrical generating capacity which may be involved, or the alternative solutions to alleviate or remove the necessity for a derating, or the schedule for implementing such a solution. Only when the applicability and the extent of any required restrictions have been determined will we be able to assess meaningfully the possible operational, system, or fuel design modifications which may be required, from these alternatives, to choose the most desirable solution, and based thereon, to establish a precise schedule for incorporation of any solution which is necessary.

In view of the above, Met-Ed requests that the Commission pursuant to 50.12 (a) exempt Met-Ed from the schedule specified in Section 50.46 (a) (2) (vi) and otherwise applicable for the Three Mile Island Nuclear Generating Station Unit 1 for the submission of an Appendix K-related exemption request. It is recognized, of course, that until Met-Ed has applied for, and the Commission has granted, an ECCS exemption request, the operation of Three Mile Island Unit 1 necessarily will be governed by any restrictions imposed pursuant to Section 50.46 as modified by any action the Director may take related to our extension request.

In the alternative, Met-Ed requests that the Commission regard this letter as an exemption request filed pursuant to 50.46 (a) (2) (vi), for the reasons stated above, no responsible discussion of the public need or consideration of alternative solutions can be included herein. In the event this latter interpretation is given our request, then Met-Ed will either supplement this submittal with the required bases and discussion of public need and alternatives when the information is available or withdraw the request, as appropriate.

Respectfully submitted,


R. C. ARNOLD
Vice President

RCA:pa

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