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FROM: Metropolitan Edison Company Reading, Pa. 19603 R. C. Arnold			DATE OF DOC 6-19-74	DATE REC'D 6-20-74	LTR X	TWX	RPT	OTHER
TO: L. M. Muntzing			ORIG 1 signed	CC	OTHER	SENT AEC PDR X SENT LOCAL PDR X		
CLASS	UNCLASS XXX	PROP INFO	INPUT	NO CYS REC'D 40		DOCKET NO: 50-289		

DESCRIPTION

Ltr trans the following:

ENCLOSURES:

Request for Extension of Time to Submit  
Emergency Core Cooling System Evaluation

**DO NOT REMOVE**

**ACKNOWLEDGED**

PLANT NAME: Three Mile Island Unit 1

( 1 Orig & 39 cys rec'd )

FOR ACTION/INFORMATION 6-20-74 GC

BUTLER(L) W/ Copies	<input checked="" type="checkbox"/> SCHWENCER(L) W/1 Copies	ZIEMANN(L) W/ Copies	REGAN(E) W/ Copies
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OGC, ROOM P-506A	SCHROEDER	GAMMILL	DIGGS (L)	SALTZMAN
MUNTZING/STAFF	MACCARY	KASTNER	GEARIN (L)	B. HURT
<input checked="" type="checkbox"/> CASE	KNIGHT	BALLARD	<input checked="" type="checkbox"/> GOULBOURNE (L)	<u>PLANS</u>
GIAMBUSSO	PAWLICKI	SPANGLER	LEE (L)	MCDONALD
<input checked="" type="checkbox"/> BOYD	SHAO		MAIGRET (L)	DUBE w/input
<input checked="" type="checkbox"/> MOORE (L) (FWR)	<input checked="" type="checkbox"/> STELLO	<u>ENVIRO</u>	REED (E)	CHAPMAN
DEYOUNG(L) (FWR)	HOUSTON	MULLER	SERVICE (I)	<u>INFO</u>
SKOVHOLT (L)	<input checked="" type="checkbox"/> NOVAK	DICKER	SHEPPARD (L)	C. MILES
GOLLER(L)	ROSS	KNIGHTON	SLATER (E)	KLECKER
P. COLLINS	IPPOLITO	YOUNGBLOOD	SMITH (L)	EISENHUT
DENISE	TEDESCO	REGAN	TEETS (L)	<input checked="" type="checkbox"/> BERNERO
<input checked="" type="checkbox"/> REG OPR	LONG	PROJECT LDR	WADE (E)	<u>AOR FILE</u>
FILE & REGION(2)	LAINAS		WILLIAMS (E)	D. THOMPSON (2)
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<input checked="" type="checkbox"/> 16 - CYS ACRS <del>HOLDING</del> SENT TO LIC. ASST.	1-GERALD ULRIKSON...ORNL	1-RD..MULLER..F-309 GT
6-20-74 GOULBOURNE	1-B & M SWINEBROAD, Rm E-201 GT	

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# Regulatory Docket File



METROPOLITAN EDISON COMPANY

SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

June 19, 1974  
GQL 0095

Mr. L. Manning Muntzing  
Director of Regulation  
Directorate of Licensing  
Office of Regulation  
U. S. Atomic Energy Commission  
Washington, D.C. 20545

Dear Mr. Muntzing:

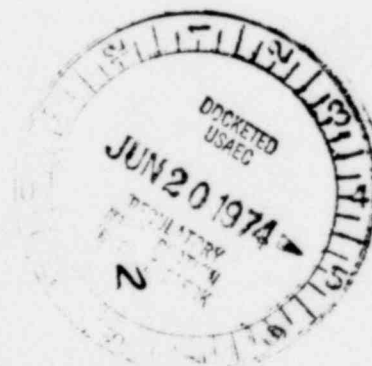
Subject: Three Mile Island Nuclear  
Generating Station Unit I  
License DPR 50  
Docket No. 50-289  
ECCS, Application for Extension

Enclosed are 39 copies and one original of an application for extension of time for submittal of an ECCS evaluation for Three Mile Island Unit I pursuant to the provisions of 10 CFR 50.46.

Sincerely,

R. C. Arnold  
Vice President

RCA:nh  
Enclosures



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REQUEST FOR EXTENSION OF TIME TO SUBMIT  
EMERGENCY CORE COOLING SYSTEM EVALUATION

Pursuant to Section 50.46 (a) (2) (iii) to 10 CFR 50, Metropolitan Edison Company (Met-Ed) requests for good cause as shown hereinafter a six-week extension of the six-month period specified in Section 50.46 (a) (2) (ii) for submission of an emergency core cooling system (ECCS) evaluation. In the absence of approval of the extension sought by this request, Met-Ed would be required to submit the evaluation for the Three Mile Island Nuclear Generating Station Unit I by August 5, 1974. The reason for this request is the difficulties experienced in developing and implementing the appropriate evaluation models.

The Three Mile Island Nuclear Generating Station Unit I is powered by a Babcock & Wilcox nuclear steam supply system (NSSS) which contains fuel supplied by the Babcock & Wilcox Company. Individual utilities like Met-Ed do not have the capability for ECCS model development and are dependent, therefore, for schedule purposes on the performance of the NSSS vendor and fuel supplier.

As recognized by the Commission in its opinion which accompanied issuance of the Acceptance Criteria, there are considerable differences between the ECCS evaluation models approved under the Interim Acceptance Criteria and the required and acceptable features of evaluation models described in Appendix K to 10 CFR 50. In many cases, the differences result from the requirement to model physical phenomena in more detail. This requirement for increased detail results in numerical analysis problems which make model development technically difficult and time consuming. Further, Appendix K does not define, approve or make available any acceptance evaluation models. The extensive effort involved and the nature of Appendix K have caused the vendor's technical organization to seek further definitions of model suitability and conformity to Appendix K from the AEC staff.

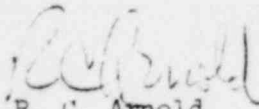
These circumstances have resulted in a situation where, in spite of the best efforts of all concerned parties, complete concurrence has not been achieved on the suitability of the models to be used. Thus, of the six-month period allowed by the new rule for implementation of Appendix K, there remains less than two months for the analysis, review, and evaluation of ECCS performance in Three Mile Island Unit I, including definition of appropriate operating restrictions and/or modifications.

Met-Ed as the licensee and operator of the Three Mile Island Nuclear Generating Station Unit I, through its sister subsidiary company, GPU Service Corporation (GPUSC), has requested that the Babcock & Wilcox Company (B&W) performs the blowdown analysis for the Three Mile Island Unit I reactor coolant system and the complete LOCA analysis of the 177 B&W fuel assemblies in the Three Mile Island Unit I reactor. Exhibit (1) attached to this request specifies that Unit 1 reactor will not be available prior to August 5, 1974. Further, the complexity of the model and the required pace of B&W's development schedule precludes detailed technical review of the completed LOCA analysis model by

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GPUSC/Met-Ed until after the six-month period. As specified in Exhibit (2), GPUSC requires three weeks, from receipt of B&W's completed LOCA analysis, for an appropriate technical review on behalf of Met-Ed. Finally, as specified in Exhibit (3), Met-Ed as the licensee, requires three weeks for the operations and safety committee reviews (pursuant to the Three Mile Island Unit I license and Appendix B of 10 CFR Part 50) and final approval. Thus, the projected date for submittal of the analysis is September 16, 1974.

As stated previously, Met-Ed cannot, until completion of the review of the B&W analyses, provide the Director with a comprehensive evaluation for the Three Mile Island Unit I facility. Accordingly, it is requested that Met-Ed be granted a six-week extension from August 5, 1974, to September 16, 1974, to provide a complete ECCS analysis in conformance with Appendix K to 10 CFR Part 50.

  
R. C. Arnold

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**Babcock & Wilcox**

Power Generation Group

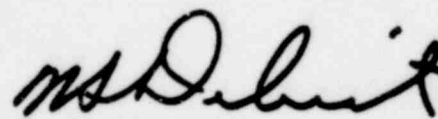
P.O. Box 1260, Lynchburg, Va. 24505

Telephone: (804) 384-5111

June 10, 1974

I hereby certify that it is the intention of the Babcock & Wilcox Company to file with the Atomic Energy Commission a Generic 177 Fuel Assembly Class Plant ECCS Analysis Report. It is intended that this report will be filed with the Atomic Energy Commission on August 4, 1974.

I further certify that, prior to filing with the Atomic Energy Commission, representatives of GPU Service Corporation will not have an opportunity to perform an indepth technical and licensing review.



W. S. Delicate,

Project Manager

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