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DOCDATE: 03/13/78  
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DOCTYPE: LETTER NOTARIZED: NO  
SUBJECT:

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LTR 1 ENCL 1

REFERENCE: NRC LTR DTD 11/11/77 AND APPLICANT'S LTR DTD 01/13/78. FURNISHING  
CONCERNS AND APPLICANT'S RESPONSE RE PROPOSED TECH SPECS CONCERNING REVISIONS  
TO THE RCS OVERPRESSURIZATION PROTECTION SYSTEM.

PLANT NAME: THREE MILE ISLAND - UNIT 1

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1584 008

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METROPOLITAN EDISON COMPANY

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

March 13, 1978  
GQL 0426

Director of Nuclear Reactor Regulation  
Attn: R. W. Reid, Chief  
Operating Reactors Branch No. 4  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

Dear Sir:

Three Mile Island Nuclear Station Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
RCS Overpressurization

Re: 1. NRC letter of November 11, 1977  
2. Metropolitan Edison Company letter of January 13, 1978 (GQL 0049)

As a result of several telephone conferences with members of your staff concerning the above referenced letters, Met-Ed agreed to address the additional concerns identified. These concerns and Met-Ed's response are as follows:

1. Met-Ed to submit proposed Technical Specifications to include the conditions for removal of the Electromatic Relief Valve from service for testing and maintenance, system enabling temperatures and Electromatic Relief Valve setpoints.

Response: Technical Specification Change Request No. 74 has been prepared and will be submitted March 13, 1978.

2. Met-Ed to reevaluate the Decay Heat Removal System for RCS overpressurization protection.

Response: Assuming the DHR system could be used to provide RCS overpressurization protection, the following engineering/construction would be necessary:

- a. Design the DHR system appurtenance, together with the relief valve(s), and discharge line to the sump, in accordance with the codes, and within the very confined space envelope available.
- b. Procure the necessary hardware, including relief valve(s), piping, hangers and snubbers, and either reducing tees or weld-o-lets to break into the existing pipe.
- c. Provide labor for installation.

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March 13, 1978  
GQL 0426

It is estimated that the above engineering/construction, including the initial evaluation to determine if the DHR system could be used to provide RCS overpressurization protection, would cost \$160,000.

3. Met-Ed to review HPI Surveillance/Test procedures to verify that no HPI testing is performed while within the overpressurization window.

Response: All TMI-1 HPI Surveillance/Test procedures have been reviewed. A Procedure Change Request has been initiated to Surveillance Procedure 1303-11.8, and will be effective prior to the forthcoming refueling outage. Precaution steps have been added to Surveillance Procedures 1303-5.2 and 1300-3H. No other procedures required changes.

4. Met-Ed to evaluate the possibility of installing limit switches on RC-V2 to monitor actual valve stem position rather than the existing design using the limitorque switches to indicate valve status.

Response: Preliminary evaluation of the valve indicates that since the valve stroke is so short (only 2.5 inches) and valve stem accessibility is limited, it is not practicable to install valve stem limit switches. Since the limitorque switches are gear-driven, it is unlikely that the valve position stops will drift. Based on the above, Met-Ed does not intend to pursue this matter further.

5. Met-Ed to evaluate alarming the MU-V16A/B/C/D valves as an alternative to key locking the motor operator breakers and valve handwheels.

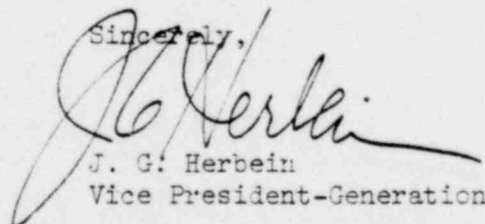
Response: Preliminary evaluation has indicated that this option is feasible and perhaps more desirable from an operations standpoint than locking the HPI valve breakers and handwheels. Upon NRC notification that alarming the HPI valves is an acceptable method of RCS overpressurization protection, Met-Ed will proceed with alarming the HPI valves.

6. Met-Ed to commit to installing the enabling alarm which monitors the overpressurization protection system enabling switch and to installing the alarm to monitor the status of the pressurizer relief block valve, RC-V2, in accordance with our submittal of January 13, 1978, as expeditiously as possible.

Response: The engineering and design for the above modifications is presently underway. Met-Ed will proceed with this project as expeditiously as possible. Installation will be performed during any outage that will permit installation, but in no case, later than the 1979 refueling outage.

In summary, Met-Ed's proposed RCS overpressurization protection consists of the proposed Technical Specifications in conjunction with the modifications described above. Should you have any further questions regarding our proposal, do not hesitate to call.

Sincerely,



J. G. Herbein  
Vice President-Generation

JGH:RJS:cjg

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