

November 1, 1979  
GQL 1336

Director of Nuclear Reactor Regulation  
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  
Operating License No. DPR-50  
Docket No. 50-289  
Reactor Vessel Internal Vent Valves

The prolonged Unit 1 outage will require that surveillances done on a "refueling period" basis be reperformed before the Cycle 6 refueling. The Tech. Spec. definition (T.S. 1.2.8) of a "Refueling Interval" limits the interval to no more than 24 months without NRC approval, and it appears unlikely that the Cycle 6 Refueling will occur by February 1981.

Technical Specification 4.16.1 concerning R. V. Internal Vent Valves is of particular importance. T.S. 4.16.1 requires that the Vent Valves be exercised and visually inspected once each "refueling period", and therefore falls into the category of surveillances which may have to be repeated.

After considering the options Met-Ed requests that the NRC grant an extension on the surveillance interval. Removal of R. V. Head does include some risk, and there are personnel safety concerns with any major lift and the personnel radiation exposures to perform these evolutions are significant. From the standpoint of public health and safety there is an increased probability of damage to irradiated fuel whenever the R.V. Head is not in place and while it is being moved.

Since June 1974 when initial criticality was achieved the eight internal vent valves have each been tested four times over the last five years for a total of 32 functional tests without a single failure.

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Due to concerns about vent valves wear at other B&W Units one vent valve was removed and given a detailed examination during the Cycle 5 refueling. No noticeable wear was found which verifies the excellent performance of the vent valves in Unit 1.

The present mode of operation, which will continue until Cycle 5 Startup, places the valves in a favorable environment. The low RC flow rates, tight chemistry controls, and absence of power operation will cause little, if any wear or crud deposition. The valves will not be subjected to the major cause of wear, high RC flow, for a longer than usual period since this depends on the Cycle length (Cycle 5 is  $265 + 15$  EFPD) which has not changed. The effect of the prolonged shutdown period combined with a normal cycle length should certainly not be significantly greater than that resulting from the first cycle of operation which was 467.4 EFPD of operation over some 20 calendar months.

In conclusion, Met-Ed requests an extension on the surveillance interval for T.S. 4.16.1.

Sincerely,



J. G. Herbein  
Vice President  
Nuclear-Operations

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