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September 3, 1981
LIL 239

Office of Nuclear Reactor Regulation
Attn: John F. Stolz, Chief
Division of Licensing
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 High Point Vents (LM-21)

In accordance with NUREG 0737 and NUREG 680 Supplement 3, the following documents were provided to Mr. R. Jacobs, of your staff, on August 24, 1981:

| Document No. | Title |
|---|---|
| GPUNC System Design Description (SDD) SDD-222A, Div. 1, Rev. 0 dated 1/8/81 | "Reactor Coolant System Venting" |
| SDD-222A, Div. II, Rev. 0 | "Reactor Coolant System Venting" |
| IE-222-21-001, Rev. 0 | "Reactor Coolant System Vent to Containment Flow Diagram" |
| IC-231-21-002, Rev. 0 | "Waste Disposal Gas System Reactor Coolant Drain Tank Vent Flow Diagram" |
| ID-222-17-001, Rev. 0 | "Electrical Elementary Diagram Reactor Coolant Vent System, Channel A" |
| ID-222-17-002, Rev. 1 | "Electrical Elementary Diagram--Reactor Coolant Vent System Channel B" |
| ID-231-17-003, Rev. 0 | "Electrical Elementary Diagram Waste Gas Disposal System--Reactor Coolant Drain Tank Venting |
| IB-664-42-001, Rev. 0 | "Instrument Loop Diagram--RC Loop A High Point Vent" |
| IB-664-42-002, Rev. 0 | "Instrument Loop Diagram--RC Loop B High Point Vent" |

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IB-664-42-003, Rev. 1 "Instrument Loop Diagram--Pressurizer Vent"

IB-664-42-004, Rev. 0 "Instrument Loop Diagram--Reactor Head Vent"

Please note that Division 1 of the SDD covers basic system criteria and that Division II describes the system, as actually designed, in detail. Division II may be used to follow the system design as shown on the various system drawings and also provides the basis for drafting detailed plant operation procedures.

Operating information furnished in Division II should be sufficient for procedures for operator use of the vents.

Since the RCS High Point Vent System is a safety grade design it can be considered a qualified system for bringing the plant to cold shutdown. A revision to Division II of the SDD which will detail the use of the pressurizer vent for achieving cold shutdown is currently under preparation.

The TMI Restart Report section 2.1.2.2 discusses the long term modifications planned for the reactor coolant system. The system piping diagram (dwg. IE-222-21-001) shows only one train for the reactor vessel head vent whereas the TMI-1 Restart Report indicates that there would be two trains. The reason that the actual design has only one train is that NUREG 0737 indicated that vent systems are not required to have redundant paths and we don't believe two paths are necessary.

The TMI-1 Restart Report indicates that vent system piping within the RCS pressure boundary would be Class N-1. The actual design as shown on the enclosed piping diagram shows the vent system piping (1" smaller) as Class N-2. TMI-1 existing design basis specifies that RBS piping 1" nominal size and smaller need not be Class 1) per the criteria of the original B&W design basis for TMI-1 RBS piping.

Sincerely,

RJ Toole for

H. D. Hukill
Director, TMI-1

HDH:CJS:vjf

cc: B. H. Grier
L. Barrett
H. Silver
S. Jacobs