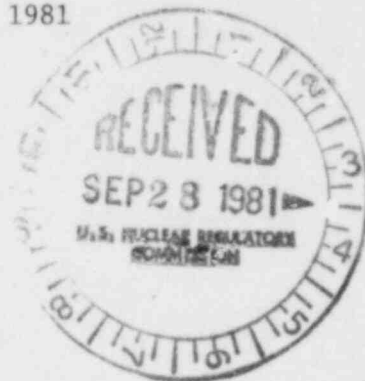




Metropolitan Edison Company
Post Office Box 480
Middletown, Pennsylvania 17057

Writer's Direct Dial Number

September 25, 1981
L1L 264



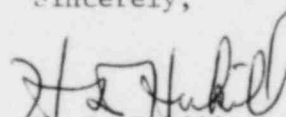
Office of Nuclear Reactor Regulations
Attn: John F. Stolz, Chief
Operating Reactors Branch No. 4
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inservice Inspection Program
REF: 1. License Amendment No. 71 and SER
2. Met-Ed Letters GQL 1357 and TLL 032

Our review of License Amendment No. 71 has revealed several items which we felt needed further clarification and in one case further relief. These items are detailed in attachments 1, 2 and 3 enclosed.

Sincerely,


H. D. Huxill
Director, TMI-1

HDH:CJS:vjf

Enclosures

cc: B. H. Grier
D. Dilanni
R. Jacobs

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ATTACHMENT 1

1. In our submittal of October 26, 1979 (GQL 1357) Table D-1 lists the parameters to be tested and Table D-2 lists our frequency of pump tests and exceptions to the ASME XI requirements. Revised pages to Table D-1 (Attachment 2) and Table D-2 (Attachment 3) reflects our request for relief from measuring the river water pump flow rate during the pumps' quarterly test. Note 12 of Table D-2 provides the basis of the request for relief.
2. Met-Ed letter GQL 1357 requested relief from the measurement of ΔP and P_i for spent fuel pumps, SF-PlA/B. The request for relief was not addressed in either Table 2.1 or 2.2 of the SER for Amendment No. 71. We again request relief from this requirement.
3. Met-Ed letter GQL 1357 requested relief for Chemical Addition pumps CA-PlA/B; parameters Q , ΔP and P_i and T_b . We understand that this request is being addressed by the inclusion of these pumps in item A.2 of Table 2.2 of the subject SER.
4. To clarify Section 4.1.7 of the SER, Met-Ed letter dated January 31, 1980 (TLL 032) indicated that there are some category A&B valves which can and are part stroke tested. This does not, however, negate the need for the relief granted for those valves which cannot be part stroked.

TABLE D-1

[illegible]

THREE MILE ISLAND - UNIT NO. 1
INSERVICE INSPECTION PROGRAM - PUMPS
EXCEPTIONS TO ASME XI REQUIREMENTS

ATTACHMENT 3
Page 1 of 2

TABLE D-2

Page 1 of 3

PUMP NAME	PUMP NO.	ASME XI CODE CLASS.	ASME III CODE CLASS	ASME XI EXCEPTION REQUESTED *	JUSTIFICATION	TESTING PERFORMED IN LIEU OF CODE REQUIREMENT
REACTOR BUILDING EMERGENCY COOLING	RR-P1A	3	Non-Nuclear	V	See Note 1	Motor Vibration will be measured
	RR-P1B			T _b	See Note 2	None
				Lubr. Level	See Note 2	None
				Monthly Testing	See Note 10	Quarterly Testing
				Q	See Note 12	Q will be measured during re-fueling outages.
SCREEN WASH	SW-P1A	3	Non-Nuclear	Q	See Note 7	Visual Observation of Flow
	SW-P1B			V	See Note 1	Motor Vibration will be meas.
				T _b	See Note 2	None
				Lubr. Level	See Note 2	None
SCREEN HOUSE VENTILATION EQUIPMENT	SW-P2A	3	Non-Nuclear	Q	See Note 3	None
	SW-P2B			V	See Note 1	Motor Vibration will be meas
				T _b	See Note 2	None
				Lubr. Level	See Note 2	None
CONTROL BUILDING CHILLED WATER	AH-P3A	3	Non-Nuclear	Q	See Note 3	None
	AH-P3B			T _b	See Note 5	None
DECAY HEAT RIVER WATER	DR-P1A	3	Non-Nuclear	V	See Note 1	Motor Vibration will be meas
	DR-P1B			T _b	See Note 2	None
				Lubr. Level	See Note 2	None
SPENT FUEL	SF-P1A	3	N-3	Pi	See Note 4	Pi will be calculated
	SF-P1B			$\frac{\Delta P}{T_b}$	See Note 4	None
				T _b	See Note 5	None
*See ASME Section	XI for Definition of Test Quantities					

ATTACHMENT 3

Page 2 of 2

Note 11

The Boric Acid Pumps will be tested only during refueling outages since the only method of testing these pumps is to inject concentrated boric acid into the Reactor Coolant Makeup System. This would adversely affect plant operations and results in additional significant volumes of radioactive waste.

Note 12

The Reactor Building Cooling Water Pumps (RR-P1A/B) supply river water to the Reactor Building Emergency Cooling Coils. These pumps will be tested during normal plant operations using a fixed resistance flow path that bypasses the Cooling Coils. This test will not measure flow rate. The testing during normal plant operations will not pump river water through the Cooling Coils because after the test, the Cooling Coils must be drained and then flushed with Nuclear Service Closed Cooling Water. The drain and flush water is drained to the Reactor Building Sump and this produces large quantities of water that must be processed through the Liquid Waste Disposal System. However, flow rate will be measured during refueling outages, when river water is pumped through the Cooling Coils in accordance with Technical Specification requirements.