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April 2, 1990
C311-90-2029

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Station Blackout: NUMARC Request for Supplemental
SBO Submittal to NRC

On July 21, 1988, the Nuclear Regulatory Commission amended its regulations in 10CFR50, adding a new section, 10CFR50.63, "Loss of all alternating current power." This section requires each light-water cooled nuclear power plant be able to withstand and recover from a station blackout (SBO) of a specified duration.

Regulatory Guide (RG) 1.155, dated August, 1988, describes a means acceptable to the NRC staff for meeting the requirements of 10CFR50.63 and concludes that NUMARC 87-00 provides guidance for conformance to 10CFR50.63 that is in large part identical to the guidance provided in the Regulatory Guide. Table 1 of the RG provides a cross-reference to NUMARC 87-00 and notes when the RG takes precedence.

On April 17, 1989, GPUN submitted its response to the SBO rule. By letter dated December 18, 1989, the NRC forwarded its safety evaluation report (SER) for the above submittal. The SER concludes that the TMI-1 SBO response meets the requirements of 10CFR50.63, the criteria of NUMARC 87-00 and RG 1.155. Subsequent to the above, NUMARC requested, via their January 4, 1990 letter, that licensees re-evaluate their SBO responses in accordance with the guidelines set forth therein and submit a supplemental SBO submittal to the NRC by March 30, 1990. The purpose of this re-evaluation is to assure the availability of proper supporting documentation and consistent implementation of NUMARC 87-00 guidance. GPUN has reviewed its TMI-1 SBO submittal pursuant to the criteria delineated in the NUMARC letter and reaffirms the following:

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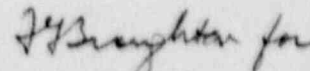
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April 2, 1990

1. GPUN has evaluated TMI-1 against the requirements of the SBO rule using guidance from NUMARC 87-00 except where RG 1.155 takes precedence. RG 1.155 Sections 3.3.6, 3.5, Appendices A and B take precedence over NUMARC 87-00.
2. Implementation of the NUMARC 87-00 guidance is consistent with the supplemental guidance provided in the enclosures to the NUMARC letter.
3. Applicability of NUMARC 87-00 assumptions, which are applicable to TMI-1, are appropriately documented.
4. In developing the SBO submittal GPUN did not depart from the accepted and applicable NUMARC 87-00 methodology.

TMI-1 has chosen a target reliability of 0.975 for the Emergency Diesel Generators (EDGs). It is important to point out that the 0.975 value is a target reliability value for the EDGs chosen by considering various factors such as off-site power design characteristics and the EDG configuration. It is not the reliability value derived from test data considering only the number of actual and attempted starts. While GPUN does have an emergency diesel generator reliability program in place, it recognizes that such a program may change when there is a final resolution to Generic Issue B-56, "Diesel Generator Reliability".

Sincerely,



H. D. Hukill
Vice President & Director, TMI-1

HDH/EP/cjg

- References:
1. TMI-1 SBO Rule Response, letter C311-89-2018, dated April 17, 1989.
 2. SER of the TMI-1 Response to the SBO Rule, dated December 18, 1989.
 3. Response to SBO Rule SER, letter C311-90-2006, dated January 25, 1990.
 4. NUMARC letter dated January 4, 1990, SBO Implementation: Request for supplemental SBO submittal to NRC.

cc: NUMARC
R. Hernan
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J. Stolz
T. Martin