

METROPOLITAN EDISON COMPANY

JERSEY CENTRAL POWER & LIGHT COMPANY

AND

PENNSYLVANIA ELECTRIC COMPANY

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Operating License No. DPR-50

Docket No. 50-289

Technical Specification Change Request No. 222, Rev. 1

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1. As a part of this request, a proposed replacement page for Appendix A is also included.

GPU NUCLEAR CORPORATION

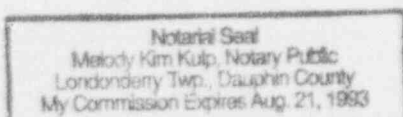
BY:

J. Broughton

Vice President and Director, TMI-1

Signed and sworn before me this
12th day of May, 1993.

Melody Kim Kulp
Notary Public



Member, Pennsylvania Association of Notaries

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
GPU NUCLEAR CORPORATION

DOCKET NO. 50-289
LICENSE NO. DPR-50

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 222, Rev. 1 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1 has been filed on the date given below with the executives of Londonderry Township, Dauphin County, Pennsylvania; Dauphin County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Daryl LeHew, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Mr. Russell L. Sheaffer, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Harrisburg, PA 17120

PA. Dept. of Environmental Resources
Bureau of Radiation Protection
P.O. Box 2063
Harrisburg, PA 17120
Attn: Richard Janati

GPU NUCLEAR CORPORATION

BY: *J. Broughton*
Vice President and Director, TMI-1

DATE: May 12, 1993

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 222

GPUN requests that the attached revised page replace 3-22 of the TMI-1 Technical Specifications.

II. Reason for the Change

This requested change to the Technical Specifications (TS) will eliminate the requirement to place the plant in the COLD SHUTDOWN condition when one train of an affected system included in TS 3.3.1 is not restored to operable status within 72 hours following initiation of maintenance activities while the plant is operating. The more appropriate course of action when one train of an affected system is determined to be inoperable and the reactor is critical is to place the plant in the HOT SHUTDOWN condition; i.e., the first lower operating plant condition with the reactor sub-critical. Additionally, paragraph 3.3.2 has been changed to specify reactor operation vice power operation to be consistent with TS 3.3.1.

III. Safety Evaluation Justifying the Proposed T.S. Change

The TMI-1 Technical Specification (TS) for ECC Systems operability is in effect when the reactor is critical. The reactor is critical in only three conditions: POWER OPERATION, REACTOR CRITICAL and HOT STANDBY. The first lower operating condition where the reactor is not critical is the HOT SHUTDOWN condition. When a component becomes inoperable and cannot be returned to OPERABLE status within the required completion time, the plant must be brought to a condition in which the LCO does not apply. This is the basis for TS 3.0.1. In the specific case of TS 3.3.1, where ECC systems must be operable for the reactor to be made critical, the first condition where the LCO does not apply is the HOT SHUTDOWN condition. The LCOs for equipment and components included in TS 3.3.1 are specified in TS 3.0.1 and TS 3.3.2 depending on the circumstances involved. LCO 3.0.1 requires, in the case of TS 3.3.1, that the plant be placed in HOT SHUTDOWN when one redundant train/component is inoperable.

The current TS 3.3.2 requires the plant to be placed in COLD SHUTDOWN if the specified systems cannot be restored to operable status within 72 hours. This is not consistent with the intent of TS 3.0.1 which requires HOT SHUTDOWN for inoperability of a given redundant train of ECC systems. Additionally, for the Decay Heat Removal Systems, it is not advisable to place the plant in COLD SHUTDOWN with only one operable train, as would be required by current TS if maintenance was being conducted and a problem occurred requiring a determination of inoperability. The Decay Heat Systems are the primary means of plant cooling when the reactor is at less than 200°F. Requiring near term entry into a plant condition where a single train of a redundant component or system may be required to safely and reliably maintain plant temperature would not be the best option. This would be the case if the plant were placed in COLD SHUTDOWN with one train of Decay

Heat Removal inoperable. TS 3.4.2 also recognizes that both Decay Heat Removal trains may be needed to safely maintain plant temperature when the plant is cooled down to less than 250°F. To be consistent with the intent of TS 3.0.1, and in addition, place the plant in the first lower operating condition where the reactor is not critical within six hours, the proposed change requires that the reactor be placed in HOT SHUTDOWN within six hours.

IV. No Significant Hazards Consideration

Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant operations. Revision of the specification to eliminate the requirement to place the plant in COLD SHUTDOWN and establish a requirement to place the reactor in HOT SHUTDOWN within six hours when a given train of an ECC system is declared inoperable during maintenance activities is consistent with the FSAR accident analysis. This concept is also consistent with the intent of Section 3.0.1 of the TMI-1 Technical Specifications (TS) and the revised Standard Technical Specifications (RSTS) for the ECCS Operating condition.

GPUN has determined that this Technical Specification Change Request poses no significant hazards consideration as defined by 10CFR 50.92. Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant operation as evaluated below:

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or consequence of an accident previously evaluated. At least two trains of ECC systems and equipment will continue to be required to be operable when the reactor is critical.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any previously evaluated. The requirement to place the plant in HOT SHUTDOWN is consistent with the actions required due to inoperability of any ECC System, independent of the initiating circumstances.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety since the change contained in the proposed amendment does not change any existing safety margins.

IMPLEMENTATION

It is requested that the amendment authorizing this change become effective upon issuance.