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Writer's Direct Dial Number

May 15, 1981
L1L 142

Division of Operating Reactors
Attn: Darrell G. Eisenhut, Director
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
Modification to 10CFR50 Appendix R Response

Per the telephone conversation held on April 28, 1981 between Messrs. D. Dilanni and P. Sears of the NRC, and Messrs. T. O'Connor, W. Itschner, and D. Mitchell of my staff, enclosed please find our revised response to our 10CFR50 Appendix R letter dated March 19, 1981 (L1L 077). Specifically, based on the discussions of April 28, 1981, Met-Ed is retracting the exemption request to Section III O and is replacing it with the enclosed justification of compliance with 10CFR50 Appendix R Section III O.

Sincerely,

H. D. Hukill
Director, TMI-1

HDH:DGM:lma

Enclosure

cc: B. H. Grier
B. J. Snyder
J. F. Stolz
D. Dilanni
H. Silver
L. Barrett



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3. Appendix R Section III O

License Amendment 44 for the fire protection program at Three Mile Island Unit 1 (TMI-1) included, in SER item 3.1.13 a requirement to demonstrate, "during a safe shutdown earthquake, the affect of the seismic event on the oil collection system will not adversely affect plant safety." The drain piping was installed per our specification S.P. 5578 for small bore piping which adequately addresses the seismic requirements for supporting this size pipe inside the containment building. The oil collection tanks installed at the 281' evaluation of the containment building were built to non-nuclear seismic I specifications and meet SME Section VIII and NFPA 30 requirements. The pump itself is mounted to seismic I requirements and the unit including motor and oil spray shields was purchased as an integral unit. The spray shields and the associated drip pans are lightweight and are not considered to constitute a missile hazard during a safe shutdown earthquake. These design criteria provide adequate assurance that during a safe shutdown earthquake the effects of the seismic event on the system will not adversely affect plant safety."

The Fire Safety Evaluation Report, Supplement 4, dated September 19, 1980 included, "furthermore, as a result of our review of the license's proposed design of the reactor coolant pumps lubricating oil collection system we find that this proposed system meets the requirements of the modification titled, 'Reactor Coolant Pump Lubricating Oil Collection System.' We find this item of the program acceptable." Therefore, it is our determination that our oil collection system for the Reactor Coolant Pumps meet the requirements of 10CFR50 Appendix R.