

**GPU Nuclear**

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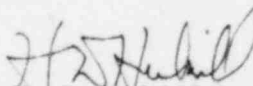
Office of Nuclear Reactor Regulation
Attn: D. G. Eisenhut, Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
10 CFR 50 Appendix R Exemptions

Based on a telephone discussion on April 12, 1982 between R. Jacobs (NRC) and members of my staff, GPU Nuclear is clarifying some of the previously submitted exemptions to 10 CFR 50 Appendix R as outlined in the enclosure.

Sincerely,


H. D. Hakill
Director, TMI-1

HDH:LWH:vjf

cc: J. F. Stolz
R. Jacobs
R. C. Haynes

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Exemption 1

Exempt from the III.G.3 requirement for additional fire suppression system protection where redundant safe shutdown equipment is located in the same fire area/zone.

Alternate Method

Where redundant safe shutdown equipment is located in the same fire area or zone a one hour fire barrier is/will be required including cable trays, tray supports exposed structural steel and rerouting of any cables within the alternate shutdown facility.

Justification

Our basis for exemption to having additional fixed fire suppression system for redundant safe shutdown equipment is outlined in our letter of December 15, 1981. Specifically, the equipment and circuits required for safe shutdown identified in the safe shutdown Evaluation will not be subjected to a theoretical design basis fire in excess of one hour. This fire rating is based on the combustible loading in each fire area/zone of the unit. For the proposed modifications listed above GPU Nuclear requests NRC approval prior to proceeding with the installation.

Exemption 2

Extend from March 19, 1981 to October 1, 1982, the date for filing additional exemptions from III.G pursuant to 50.12(a) and 50.48(c)(6).

Justification

TMI Unit 1 has developed and implemented a significant number of fire protection modifications based on the TMI-1 Fire Hazards Analysis to resolved lessons learned from the fire at Browns Ferry Nuclear Plant. With the issuance of Appendix R to 10 CFR 50, an extensive reanalysis of the Fire Hazards Analysis for TMI-1 was undertaken and is still in progress. GPU Nuclear with contractor support is applying a significant effort to complete the reassessment of remaining modifications which may be necessary for conformance with Section III.G. The additional time requested will allow time to quantify in detail the differences between what has been approved and the specific requirements of III.G.

Since TMI-1 is presently in a shutdown condition and will remain as such until at least October 1, 1982, and because of the existing fire protection installed; there is no undue risk to the health and safety of the public involved in activities at TMI-1 until completion of this reassessment.

Exemption 3

Extend from February 17, 1981 to October 1, 1982, the date from which the installation schedules established in 50.48(c)(2) and (3) are calculated.

Justification

When the Fire Protection Rule was approved by the Commission, it was understood that the time required for us to re-examine previously approved configurations at TMI-1 to determine whether we met the requirements of Section III.G of Appendix R to 10 CFR 50 was not well known. A revised fire hazards analysis for TMI-1 which is in progress needs to be developed to provide in detail the basis of compliance and the need for exemption as necessary. By necessity "time clocks" of Appendix R must be reset in order to allow TMI-1 to come into compliance pending the outcome of this reassessment. Since TMI-1 is currently in a shutdown condition and will remain shutdown until at least October 1, 1982, and because of the existing fire protection installed, there is no undue risk to the health and safety of the public involved in activities at TMI-1 until completion of this reassessment.