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January 21, 1994
C311-94-2010

Mr. T. T. Martin
Regional Administrator, Region 1
US Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406-1415

Dear Sir:

Three Mile Island Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Request for a Regional Temporary Waiver of Compliance

On January 20, 1994, at 11:00 a.m., GPU Nuclear orally requested a regional temporary waiver of compliance from the requirement to conduct the Control Rod Movement surveillance test. At 12:55 p.m. on January 20, 1994, Ms. Michele Evans, TMI Senior Resident Inspector, informed Mr. Jack Wetmore, Manager, TMI Licensing, that the request had been granted. This letter is a followup to GPU Nuclear's oral request for a regional temporary waiver of compliance.

The Control Rod Movement surveillance test is a requirement of TMI-1 Technical Specification 4.1.2 (Table 4.1-2). The current due date for the surveillance is Thursday, January 20, 1994 and the late date for the surveillance (the allowable surveillance frequency of 14 days plus 25%) will be Sunday, January 23, 1994. GPU Nuclear requested a waiver of compliance be effective immediately until January 28, 1994. GPU Nuclear intends to perform the surveillance on or before January 28, 1994.

The temporary waiver of compliance was requested to minimize the possibility of a reactor power reduction or trip as a consequence of surveillance testing that is required to be performed during the extremely cold weather which the PJM grid is currently experiencing. TMI-1 has previously experienced a reactor power reduction due to an inadvertent rod drop that occurred during the performance of the biweekly control rod movement surveillance that was the result of a faulty cable/stator electrical connection (December 12, 1991). Note: The inadvertent rod drop did not affect the ability of the Control Rod Drive Mechanisms to perform their safety function.

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The requested duration for the waiver of compliance will allow GPU Nuclear to postpone the performance of the Control Rod Movement surveillance testing until the extremely cold weather has abated and the PJM grid is restored to normal conditions (no voltage reductions or blackouts).

The Commonwealth of Pennsylvania has declared a state of emergency in response to the current unprecedented extremely cold weather. The PJM grid is currently undergoing mandatory voltage reductions and rolling blackouts. It is in the public interest to minimize all activities that could jeopardize current electrical production.

The safety significance of postponing the performance of the surveillance until January 28, 1994 is minimal. The biweekly surveillance interval stated in current TMI-1 Technical Specifications is very conservative when compared to the 92 day surveillance interval specified in NUREG 1430, Revised Standard Technical Specifications (RSTS) for B&W Plants. The intent of the surveillance is to ensure control rod movement, trippability and the reliability of the control rod mechanisms. The control rod mechanism movement surveillance has been successfully performed in accordance with the surveillance interval since the plant returned to power after the 10 R outage. The reliability of the control rod mechanism can be assured during the period for which the temporary waiver of compliance has been requested by monitoring other available indicators of control rod performance that are obtained from other Technical Specification required surveillance activities and from plant instrumentation such as the asymmetric rod position indicator alarm.

We note that RSTS for B&W Plants specifies a 92 day surveillance frequency for the performance of verifying control rod freedom of movement (SR 3.1.4.2, page 3.1-9) versus the 14 day surveillance interval in the TMI-1 Technical Specifications. The Bases for the RSTS 3.1.4.2 (page 3.1-26) states the bases for the 92 day surveillance interval takes into consideration other information available to the operator in the control room and the RSTS requirement for verification that individual control rod positions are within 6.5% of their group average be performed every 12 hours with the reactor at power. Along this same line, TMI-1 Technical Specification 4.1-1.23,24 requires verification of control rod absolute/relative position comparison be performed on a shiftly (once every 12 hours) surveillance interval with the plant critical. This requirement is implemented by GPU Nuclear via TMI-1 Surveillance Procedure 1301-1.

The requested temporary waiver of compliance does not involve a significant hazards consideration because:

1. There is no significant increase in the probability or consequences of an accident previously evaluated because control rod mechanism operability is verifiable via other available information and Technical Specification required surveillance and because the specified duration of the temporary waiver of compliance is much less than the 92 day surveillance interval that would be allowed under NUREG 1430.

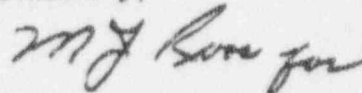
2. It will not create the possibility of a new or different kind of accident from any accident previously evaluated. A one-time change in the frequency in the performance of the control rod movement surveillance does not change plant operations or have any impact on plant systems, structures or components, and
3. It does not involve a significant reduction in a margin of safety. The frequency of Technical Specification surveillance is not a specified margin of safety in TMI-1 Technical Specifications.

The temporary waiver of compliance will not involve irreversible environmental consequences because the extension of the surveillance interval has no impact on plant operations or plant effluents.

The TMI-1 Plant Review Group reviewed and approved the action to request a temporary waiver of compliance from the specified 14 day frequency requirement for the control rod movement surveillance on Wednesday, January 19, 1994.

GPU Nuclear appreciates the prompt NRC review and approval of the temporary waiver of compliance. If you have any questions regarding this matter, please contact Mr. John Schork, TMI Licensing Engineer at (717) 948-8832.

Sincerely,



Y. G. Broughton
Vice President & Director, TMI

JSS/emf

cc: M. G. Evans - TMI Senior Resident Inspector
R. W. Hernan - Senior Project Manager
Document Control Desk