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Writer's Direct Dial Number:

March 22, 1994
C311-94-2039

U. S. Nuclear Regulatory Commission
Att: Document Control Desk
Washington, DC 20555

Att: Jose A. Calvo
Assistant Director for Region I Reactors, NRR

Dear Sir:

Subject: Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request (TSCR) No. 242 and
Request for Enforcement Discretion
Control Rod Trip Insertion Time Testing

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request (TSCR) No. 242.

Also enclosed is a Certificate of Service for this request, certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection.

GPU Nuclear requests a Technical Specification Change Request to the Control Rod Trip Insertion Time Testing acceptance criterion for control rod drop time for the remainder of Cycle 10. It is requested that this TSCR be processed under exigent procedures to support the TMI-1 operating schedule. In order to allow the TMI-1 startup to proceed within the current Technical Specification requirements, considering the restrictions for an inoperable control rod, GPU Nuclear additionally requests that a Notice of Enforcement Discretion be issued allowing startup until the TSCR is approved. Enclosure 2 documents this request. GPU Nuclear understands that the Notice of Enforcement Discretion would be limited to the period prior to the issuance of the amendment approving this TSCR.

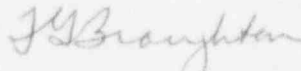
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An analysis of the root cause of increased Control Rod Drive Mechanism (CRDM) drop times at TMI-1 and the planned actions to minimize the likelihood of exceeding the proposed Cycle 10 technical specification limit is contained in Enclosure 3. It is concluded that crud buildup in the area of CRDM thermal barriers and the ball check valves is the most likely cause. Planned actions to support startup are:

1. Performance of multiple drops of CRDMs with slow drop times to free up deposits and reduce as-left drop times. This action has been completed.
2. Increase lithium concentration in the RCS to raise pH to reduce the rate of corrosion
3. Increase the amount of CRDM exercise done periodically during the fuel cycle to reduce the likelihood of crud buildup in the gap between the lead screw and the thermal barrier bushing.
4. Initiate a special test program to verify CRDM drop times. Initially, the drop times will be obtained within three months of reactor startup. Subsequent testing intervals will be based on the results.
5. During startup when plant power is between 0% and 25% FP, the high flux trip setpoint will be set at $\leq 50\%$ to assure the FSAR acceptance criteria for the startup accident are met.

Pursuant to 10 CFR 50.91(a)(1), enclosed is our analysis, applying the standards in 10 CFR 50.92 to make a determination of no significant hazards considerations. As stated above, pursuant to 10 CFR 50.91(a), we have provided a copy of this letter, the proposed change in Technical Specifications, and our analyses of significant hazards considerations to Robert J. Barkanic, the designated representative of the Commonwealth of Pennsylvania.

Sincerely,



T. G. Broughton
Vice President and Director, TMI

DJD/plp

Enclosure: 1) Technical Specifications Change Request No. 242
2) Enforcement Discretion of TMI-1 Control Rod Trip Insertion Time
3) Root Cause Evaluation of Slow CRDM Drop Times at TMI-1
4) Certificate of Service for Technical Specification Change Request No. 242

cc: Region I Administrator (T. T. Martin)
TMI-1 Senior Project Manager (R. W. Hernan)
TMI Senior Resident Inspector (M. G. Evans)
Director, Project Directorate I-4 (J. F. Stolz)
Director, Division of Reactor Projects, Region I (W. D. Lanning)

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. 242 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with 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. Darryl 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

Director, Bureau of Radiation Protection
PA. Department of Environmental Resources
Fifth Floor, Fulton Building
Third and Locust Streets
P. O. Box 2063
Harrisburg, PA 17120
Attn: Mr. Robert J. Barkanic

GPU NUCLEAR CORPORATION

BY:

J. J. Benington
Vice President and Director, TMI

DATE:

March 22, 1994