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June 29, 1994
C311-94-2098

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

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Proposed Alternative to 10 CFR 50.55a(f)(4)(ii) - Request
to Extend the Current 120 Month IST Interval by 24 Months

GPU Nuclear is aware of the NRC's proposed rulemaking regarding an alternative to the 120-month update required by 10 CFR 50.55a for Inservice Inspection (ISI) and Inservice Testing (IST). Submittals by another utility (Entergy,¹ dated October 21, 1993 and April 14, 1994 followed by a meeting attended by representatives of the Nuclear Energy Institute (NEI) resulted in a proposed temporary alternative to meeting the requirements of 10 CFR 50.55a(f)(4)(ii) until such time as the rule becomes final. The purpose of this letter is to request a 24 month extension of the current 120 month IST interval. The ISI program is not affected by this request¹.

The current regulations require licensees to update the ISI and IST programs to later editions and addenda of the ASME Boiler and Pressure Vessel (B&PV) Code Section XI every 120 months. The changes proposed by the proposed rule eliminate the updating requirements based on specific intervals. Instead, the proposed rule states that each edition and addenda of the B&PV Code, and the ASME Operations and Maintenance Code (O&M Code) will become effective six months after the date of publication. Licensees will be able, but not required, to use later editions, or portions thereof, as they became effective without further NRC approval. We understand that the NRC will identify any changes that are safety significant and perform a backfit analysis such that changes will be incorporated into the regulations by rulemaking, identifying

¹ Extension of the first 10 year interval was allowed by the ASME Section XI Code for ISI due to the extended shutdown of TMI-1 following the accident at TMI-2. Because the extension was not allowed for IST, the 10 year intervals for the two programs do not coincide.

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the implementation schedule.

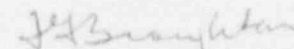
In accordance with 10 CFR 50.55a(a)(3), which allows the NRC to authorize alternatives to selected requirements contained in 10 CFR 50.55a, GPU Nuclear is requesting a 24 month extension of the present 120 month IST interval which ends September 8, 1994. IST activities will continue to be in accordance with the current NRC approved IST program as required by the TMI-1 Technical Specifications (TS) until September 8, 1996.

With this relief, GPU Nuclear will be able to suspend certain of our current activities devoted to program changes which add additional burden without a commensurate safety benefit. Considerable work toward updating the IST program to the 1989 Edition of the Code has been completed. However, the additional resources needed to complete the update by September 9, 1994 could be spared if relief is granted.

The proposed extensions would provide an acceptable level of quality and safety. The current IST Program is in accordance with the 1980 Code Edition with Addenda through Winter 1980 and has been approved by the NRC. We understand that ASME code changes which constitute a substantial safety benefit (e.g., augmented examination of the reactor vessel) are separately addressed by the rulemaking (e.g., 50.55a(g)(6)(ii)(A)) and are unaffected by the proposed extension to the 120 month period.

Failure to extend the current 120 month periods would result in hardship or unusual difficulty without a compensating increase in the level of quality and safety and would effectively negate much of the benefit of the proposed alternative. Approval is needed by September 1, 1994 to ensure compliance with the current regulation.

Sincerely,



T. G. Broughton
Vice President and Director, TMI

MRK

cc: Region I Administrator
TMI-1 Senior Project Manager
TMI Senior Resident Inspector