

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
AND
PENNSYLVANIA ELECTRIC COMPANY

Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 205

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1. As a part of this request, proposed replacement pages for Appendix A are also included.

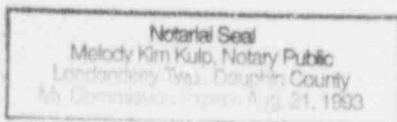
GPU NUCLEAR CORPORATION,

BY:

Jeffrey H. Hagan
Vice President and Director, TMI-1

Sworn and subscribed to
before me this 12th day
of June, 1991.

Melody Kim Kulp
Notary Public



Member, Pennsylvania Association of Notaries

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NO. 50-289
LICENSE NO. DPR-50

GPU NUCLEAR

This is to certify that a copy of Technical Specification Change Request No. 205 to Appendix A of the Operating License DPR-50 for Three Mile Island Nuclear Station Unit 1, has, on the date below, been filed with the U.S. Nuclear Regulatory Commission and served to the chief 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. Jay H. Kopp, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Ms. Sally Klein, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Court House
Harrisburg, PA 17120

Mr. Thomas M. Gerusky, Director
Bureau of Radiation Protection
PA Dept. of Environmental Resources
P.O. Box 2063
Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY:

J. Braghta
Vice President and Director, TMI-1

DATE: June 12, 1991

I. TECHNICAL SPECIFICATION CHANGE REQUEST NO. 205

GPUN requests that the attached revised pages replace 3-18c and 3-18d, and that page 3-18e be added to the TMI-1 Technical Specifications.

II. Reasons for the Changes

This change is being submitted to revise the following Technical Specification sections and the bases statements for the purpose of clarification.

The Technical Specification (T.S.) changes involve the specified sections of the following pages:

1. page 3-18c - revise T.S. 3.1.12 to 1) clarify specification section 3.1.12.1.a by separating the present statement into two individual items and deleting the parenthetical phrase without changing the content of the specification; 2) revise section 3.1.12.2 to clarify the PORV setpoint ranges and provide action requirements to be satisfied when the setpoint ranges are not met; 3) revise section 3.1.12.3 to require that the breakers for valves MU-V16A/B/C/D be open for the situation identified; and 4) revise section 3.1.12.4 by relocating the PORV requirements from this section to section 3.1.12.2 and clarify the Block Valve requirements by separating the statements.
2. page 3-18d - revise the bases paragraphs for clarity.

III. Safety Evaluation Justifying the Proposed T.S. Change

The function of the PORV is to prevent the possibility of inadvertently depressurizing or over pressurizing the Reactor Coolant System (RCS). A dual setpoint is utilized to provide overpressure protection during startup and shutdown conditions, and normal operation. The PORV normally remains in the closed position except when pressure in the RCS exceeds the nominal setpoint ($\geq 275^{\circ}\text{F}$ - 2450 psig and $< 275^{\circ}\text{F}$ - 485 psig).

Normal RCS pressure control is by the pressurizer steam cushion in conjunction with the pressurizer spray valve, PORV and heaters. The RCS is protected against overpressure by the pressurizer code safety valves. The RCS normally operates with a steam or gas cushion in the pressurizer; no anticipated operations involve a solid water condition. Considering the modest rate of pressure rise from operational events and the existence of high level alarms in the pressurizer that would normally alert an operator to an abnormal condition, it is reasonable to expect the operator to terminate an event prior to reaching an overpressure condition. However, even without operator action, a properly functioning PORV will terminate any pressure increase.

The electric motor-operated PORV block valve, located between the pressurizer and PORV, can be closed to prevent pressurizer steam blowdown in the unlikely event the PORV fails to reclose after being actuated.

The PORV setpoints are specified with tolerances assumed in the bases for T.S. 3.1.2. Above 287°F (275°F + 12°F), the PORV setpoint has been chosen to limit the potential for inadvertent discharge or cycling of the PORV. Other action such as removing the power from the PORV has the same effect as raising the setpoint which also satisfies the requirement. There is no upper limit on this setpoint as the Pressurizer Safety Valves (T.S. 3.1.1.3) provide the required relief.

Below 263°F (275°F - 12°F), the PORV setpoint is reduced to provide the required low temperature overpressure relief when high pressure sources and flow paths are in service. There is no lower limit on the pressure actuation specified as lower setpoints also provide this same protection.

In both cases, the 275°F ± 12°F setting is specified to reflect the nominal value which allows for normal variation in the temperature setpoint while maintaining the tolerances assumed in the bases for T.S. 3.1.2. Either pressure actuation setpoint is acceptable within the temperature range between 263°F and 287°F.

Above 287°F (275°F + 12°F), continued operation is permitted with the PORV and/or Block Valve shut since no credit is taken for the valves in the safety analyses. Because the PORV is used neither as the primary means of mitigating a design-basis steam generator tube rupture accident, nor for RCS pressure control during cooldown, the PORV T.S. requirements are relocated from section 3.1.12.4 to section 3.1.12.2.

With the exception of the proposed change to T.S. 3.1.12.2, the proposed changes are administrative and editorial in nature. They individually provide a clarification of the previous wording and will not result in a change to the associated hardware or operating practices. The proposed revision to T.S. 3.1.12.2 adds requirements for action when setpoint ranges are not met.

IV. No Significant Hazards Consideration

Since the T.S. provide assurance of the capability to isolate the pressurizer discharge line or require plant shutdown, and no credit is taken for PORV actuation in safety analyses, GPUN has determined that this T.S. change request poses no significant hazards as defined by 10 CFR 50.92. Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant

operations as evaluated below.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or consequences of an accident previously evaluated. The proposed administrative and editorial revisions clarify the existing wording and where an action is proposed, section 3.1.12.2, it is in response to not meeting setpoint ranges.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any previously evaluated. The proposed amendment does not modify plant operation. It will continue to be operated in accordance within the limits of the existing accident analysis and margins of safety.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety. The proposed amendment does not change any existing hardware or its setpoints and thereby preserves the existing safety margins.

V. Implementation

It is requested that the amendment authorizing these changes become effective on issuance and shall be implemented within sixty days of receipt.