



GPU Nuclear Corporation
Post Office Box 480
Route 441 South
Middletown, Pennsylvania 17057-0191
717 944-7621
TELEX 84-2386
Writer's Direct Dial Number:

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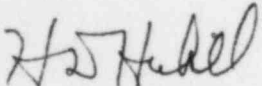
Office of Nuclear Reactor Regulation
Attn: J. F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 200555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 9TMI01)
Operating License No. DPR-50
Docket No. 50-289
Environmental Qualification of Electrical Equipment (Supp. 1)

As discussed in a phone conversation of February 17, 1984 by J. Van Vliet (NRC) and L. W. Harding (GPUN) part of the discussion of Item 60 on E/P Converters was inadvertently omitted. Because qualification of this E/P converter can only be shown by analysis in a steam environment, it will be replaced by March, 1985 in order to satisfy 10CFR50.49. A justification for continued operation and revised page 3 of Attachment II of our February 10, 1984 (5211-84-2038) submittal is attached.

Sincerely,


H. D. Hukill
VP - TMI-1

cc: J. Van Vliet
R. J. Conte

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Justification for Continued Operation

Introduction

Bailey E/P Converters for the EFW control valves are required for the proper operation of the Emergency Feedwater System. No testing basis is available to justify their operation as NRC requires. We agree that testing should be performed to substantiate operability. Therefore, the E/P converters will be replaced with units that have been tested.

Discussion

The EFW System serves to provide heat removal from the primary during accidents when the main feedwater system is not available. In the event of an HELB in the Intermediate Building failure of E/P Converter under a steam environment could render the control valves inoperable.

In this unlikely event of an HELB in the Intermediate Building the proposed method for alternate cooling of the RCS would be feed and bleed using the makeup pumps and reactor coolant safety valves.

Conclusion

Therefore, based on the Feed and Bleed cooling method which employs safety grade environmentally qualified equipment, we conclude that TMI-1 can operate safely until such time as the Bailey E/P Converters are replaced.

- d. Qualification of lead splices is controlled within the corrective maintenance program by GPUN procedure '420-Y-15.

EFW-2 was analyzed in Westinghouse Report dated 1/81 for motor insulation life analysis which envelope the thermal lag peak for the Intermediate Bldg. of 326°F.

Similarity for the above listed motors is established by Westinghouse report WCAP 8754, Rev. 1, Section 2.

D. Victoreen Radiation Monitors

1. TER Item 53 [RM-A2, A5, A6]

These radiation monitors (RM-A2, 5 & 6) are indicators of LOCA and are located outside containment (subject to a mild environment). They are not required for a main steam line or feedwater line break. These SCEW sheets will be deleted.

E. Static O Ring Pressure Switch

1. TER Item 57 [FW Iso. Press Switch (600-607)]

These switches will be replaced prior to June 1984 by a qualified pressure switch. No justification for continued operation is required since the plant will not go critical prior to restart and therefore no nuclear heat will be generated.

F. Bailey E/P Converters

1. TER Item 60 [MSV-4][EFV-30]

The limiting design basis event for these components is a steamline break in the Intermediate Building with loss of offsite power (condenser unavailable). For this event if MSV-4's are not available due to E/P converter failure pressure control and heat removal are accomplished via the Main Steam Safety Valves when EFW is available. Therefore, the E/P converters for the MSV-4's need not be environmentally qualified.

Since testing information for the E/P converters for the EFV-30's is not available, they will be replaced with qualified converters by March, 1985.

G. NAMCO Limit Switches

1. TER Item 66 & 67 [MSV-6; MSV-13]

Under LOCA and MSLB sufficient flow is provided to the OTSG's by a single motor driven EFW pump. (See GPUN letter dated 3/22/83). The steam driven EFW pump is only required for station blackout which does not produce a harsh environment. Failure of the limit switch (MSV-6) with MSV-6 open may result in initially overfeeding the OTSG's which could be reduced immediately (manually) based on qualified EFW flow and OTSG level instrumentation. Therefore the EFW system will function and the operator will not be misled. Failure of the limit switch (MSV-13) results in the inability to monitor valve position and may result in lifting reliefs but