

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
AND
PENNSYLVANIA ELECTRIC COMPANY
THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 252

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF DAUPHIN) SS:
)

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 part of this request, proposed replacement pages for Appendix A are also included.

GPU NUCLEAR CORPORATION

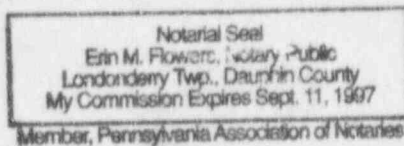
BY: J. Broughton
Vice President and Director, TMI

Sworn and subscribed before me this

17th day of May, 1995.

Erin M. Flower

Notary Public



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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. 252 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. Daryl LeHew, Chairman
Board 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
Attn: Mr. Robert Barkanic
Pa Dept. of Environmental Resources
P. O. Box 2063
Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY: J. Broughton
Vice President & Director, TMI

DATE: May 17, 1995

ENCLOSURE

I. TECHNICAL SPECIFICATION CHANGE REQUEST NO. 252

GPU Nuclear requests that the following changed replacement pages be inserted into the existing Technical Specifications:

Revised pages: 3-19, 3-20

These pages are attached to this change request.

II. REASON FOR CHANGE

This change is requested to modify TMI-1 Technical Specification Sections 3.2.2.a and 3.2.2.b to remove the volume and boron concentration requirements for the chemical addition system boric acid mix tank (BAMT) and reclaimed boric acid storage tank (RBAST), and incorporate these parameters in the TMI-1 Core Operating Limits Report (COLR). Removal of these parameters is consistent with the intent of NRC Generic Letter 88-16 guidance for placing cycle-dependent parameters into the COLR. The proposed change is also consistent with the intent of the Standard Technical Specifications for Babcock and Wilcox Plants, NUREG-1430, July 1992, since chemical addition tank volume and boron concentration parameters are not specified in these Standard Technical Specifications.

Technical Specification Section 3.2 Bases is also revised to remove reference to the specific values for the chemical addition system BAMT and RBAST volume and boron concentration, consistent with the proposed change to Technical Specification Sections 3.2.2.a and 3.2.2.b, above, as well as the reference to the borated water storage tank volume and boron concentration parameters. The Bases are further modified to clarify the methodology used to establish these parameters.

III. SAFETY EVALUATION JUSTIFYING CHANGES

The minimum volume and boron concentration requirements for the chemical addition system boric acid mix tank (BAMT) and reclaimed boric acid storage tank (RBAST), specified in Technical Specification Sections 3.2.2.a and 3.2.2.b, are determined on a cycle specific basis as part of the overall core reload design evaluation and analysis. These requirements ensure that there is a borated water source other than the Borated Water Storage Tank (Technical Specification Section 3.3.1.1) that is capable of bringing the reactor to a cold shutdown condition at any time in the cycle with the maximum worth rod stuck out. The analytical methods used to determine these parameters are in accordance with those previously reviewed and approved by the NRC for use at TMI-1, as described in Topical Report BAW-10179P-A. The specific values of these parameters in the TMI-1 COLR will be modified through the 10 CFR 50.59 process when such values are developed using NRC-approved methodologies consistent with all applicable limits of the safety analyses addressed in the TMI-1 FSAR. The

Technical Specifications retain the requirement to maintain the plant within the appropriate bounds of these limits. As currently required by Technical Specification Section 6.9.5.4, any revisions to the Core Operating Limits Report will be provided to NRC upon issuance for trending information. Therefore, the proposed change has no adverse affect on nuclear safety or safe plant operations. Removal of these parameters is consistent with the intent of NRC Generic Letter 88-16 guidance for placing cycle-dependent parameters into the COLR. The minimum boron storage requirement is dependent on cycle-specific conditions such as cycle length, reload batch size, and gadolinia/burnable poison rod assembly loading. The proposed change is also consistent with the intent of the Standard Technical Specifications for Babcock and Wilcox Plants, NUREG-1430, July 1992, since the Standard Technical Specifications do not contain requirements for the chemical addition system or chemical addition tank volume and boron concentration parameters.

Changes to the Technical Specification Section 3.2 Bases provide consistency with the proposed change to Technical Specification Sections 3.2.2.a and 3.2.2.b, as described above. The Bases are also changed to clarify the description of the existing methodology used to establish these parameters and to omit injection times which are examples of typical values and may be mistakenly construed as actual limits. Changes also are made to correct a typographical error reference to Section 3.2 in lieu of 3.3 and minor grammatical errors. The specific values of the Borated Water Storage Tank (BWST) volume and boron concentration parameters in the Technical Specification Section 3.2 Bases is redundant to the Technical Specification Section 3.3 requirements which ensure appropriate limits are maintained. The present values in the Technical Specification 3.2 Bases are therefore relocated to the COLR consistent with the changes described above. Accordingly, these changes to Technical Specification Section 3.2 Bases are considered administrative in nature.

IV. NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPU Nuclear has determined that the Technical Specification Change Request poses no significant hazards as defined by NRC in 10 CFR 50.92.

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 amendment relocates chemical addition tank volume and boron concentration parameters from Technical Specifications to the TMI-1 Core Operating Limits Report. The proposed amendment provides continued control of the values of these parameters and assures these values are developed using NRC-approved reload methodologies consistent with all applicable limits of the safety analyses addressed in the TMI-1 FSAR. The Technical Specifications retain the requirement to maintain the plant within the appropriate bounds of these limits. Therefore, the proposed amendment has no effect on the probability of occurrence or consequences of an accident previously evaluated.

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 accident previously evaluated. The proposed amendment relocates chemical addition tank volume and boron concentration parameters to the TMI-1 Core Operating Limits Report. The Technical Specifications retain the requirement to maintain the boric acid mix tank and reclaimed boric acid storage tank volume and boron concentration parameters within the appropriate limits. Therefore, the proposed amendment has no effect on the possibility of creating a new or different kind of accident from any accident previously evaluated.
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 provides continued control of the boric acid mix tank and reclaimed boric acid storage tank volume and boron concentration parameters and assures these values remain consistent with all applicable limits of the safety analyses addressed in the TMI-1 FSAR. Therefore, it is concluded that operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

V. IMPLEMENTATION

It is requested that the amendment authorizing this change become effective upon issuance.