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June 1, 1995
C311-95-2210

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

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. 251
Use of Advanced Clad Assemblies

In accordance with 10 CFR 50.4(b)(1), attached is Technical Specification Change Request No. 251 (Attachment I).

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.

The purpose of this TSCR is to request that the TMI-1 Technical Specifications be revised to describe the use of two zirconium-based advanced fuel rod cladding materials which fall outside the specification range of Zircaloy or ZIRLO cladding material. Four rods of each of the advanced cladding materials will be used in each of two (2) fuel assemblies scheduled to be loaded during the upcoming 11R refueling outage (September 1995).

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 Mr. Robert Barkanic, the designated representative of the Commonwealth of Pennsylvania.

Attachment II contains an analysis which addresses the criteria of 10 CFR 50.12 to permit the granting of an exemption to the requirements of 10 CFR 50.46, 10 CFR 50.44, and Appendix K to 10 CFR 50. As described in the TSCR, the proposed change will result in some of the allowed fuel cladding materials being outside the scope of "Zircaloy" as specified in these regulations. Therefore, an exemption to these requirements is hereby

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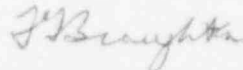
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requested. Issuance of the exemption by June 23, 1995, would preclude any potential impact on fuel assembly refabrication costs. However, GPU Nuclear requests approval of this exemption no later than July 21, 1995, to support final fuel delivery schedules for the upcoming 11R refueling outage.

Attachment III is a B&W Fuel Company (BWFC) Report which describes the advanced cladding demonstration program. Attachment IV is a BWFC evaluation of the M4 and M5 cladding material to demonstrate the acceptability of the performance of these alloys in TMI-1 Cycles 11, 12, and 13. Please note that the information contained in these reports is proprietary to BWFC, and should be withheld from public disclosure. An affidavit supporting this proprietary designation is included in each of the Attachments.

Sincerely,



T. G. Broughton
Vice President and Director, TMI

DJD/plp

Enclosure: Certificate of Service for TSCR No. 251

Attachments: I TSCR No. 251
II Application for Exemption from Requirements of 10 CFR 50.46, 10 CFR 50.44, and Appendix K to 10 CFR 50 that Fuel Cladding Must be Zircaloy
III BWFC Topical Report BAW-2133P
IV BWFC Proprietary Document, "Evaluation of M4 and M5 Cladding Alloys for TMI-1"

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