

ENCLOSURE

I. TECHNICAL SPECIFICATION CHANGE REQUEST NO. 252, REVISION 1

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

Revised pages: ii, 3-19, 3-20

These pages are attached to this change request, and are revised to reflect deletion of Technical Specification Section 3.2.

II. REASON FOR CHANGE

This change is requested to remove Technical Specification Section 3.2, Makeup and Purification and Chemical Addition Systems requirements and Bases from the Technical Specifications. The design pertinent requirements and bases, excluding action statement 3.2.2.c, associated with the function of these systems to provide control of the reactor coolant boron concentration are being incorporated into the TMI-1 Updated Final Safety Analysis Report (UFSAR).

The proposed change is consistent with the Standard Technical Specifications for Babcock and Wilcox Plants, NUREG-1430, July 1992, since Makeup and Purification and Chemical Addition System requirements are not specified in these Standard Technical Specifications. This change is also consistent with NRC Commission guidance for the content of Technical Specifications issued in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 22, 1993), which has recently been codified in a revision to 10 CFR 50.36 issued July 19, 1995, 60 FR 36953.

III. SAFETY EVALUATION JUSTIFYING CHANGES

Technical Specification Section 3.2 currently specifies operating requirements for the Makeup and Purification System and Chemical Addition System to provide adequate boron under all operating conditions to assure the ability to bring the reactor to a cold shutdown condition. Deletion of TMI-1 Technical Specification 3.2 and incorporation of these design requirements into a licensee-controlled document does not adversely affect nuclear safety or safe plant operations since the chemical addition system boron storage volume and concentration requirements will be established and maintained as described in the TMI-1 UFSAR. Relocation of the Makeup and Purification and Chemical Addition Systems design requirements and Bases, excluding action statement 3.2.2.c, currently contained in Technical Specification Section 3.2 into the TMI-1 UFSAR ensures that these systems requirements and bases are appropriately controlled in accordance with the requirements of 10 CFR 50.59. Additionally, it is

noted that the requirements of existing TMI-1 Technical Specification Section 3.3 provide the necessary assurance that the TMI-1 design basis accident and transient analysis requirements related to cold shutdown boration are maintained, which is also consistent with NUREG-1430.

This change is consistent with the Standard Technical Specifications for Babcock and Wilcox Plants, NUREG-1430, July 1992, since Makeup and Purification and Chemical Addition Systems requirements are not specified in these Standard Technical Specifications. The NRC Commission has provided guidance for the content of Technical Specifications issued in its "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" ("Final Policy Statement"), 58 FR 39132 (July 1992), which has been codified in a revision to 10 CFR 50.36, 60 FR 36953 (July 19, 1995). The Final Policy Statement as codified in the revision to 10 CFR 50.36, identifies four (4) criteria to be used in determining whether a particular matter is required to be included in the Technical Specifications, as follows: (1) installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; (2) a process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; (3) a structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier; and (4) a structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety. As a result, existing Technical Specification requirements which fall within or satisfy any of the criteria in the Final Policy Statement must be retained in the Technical Specifications, while those Technical Specification requirements which do not fall within or satisfy these criteria may be relocated to other, licensee-controlled documents.

Technical Specification Section 3.2 does not contain any instrumentation used to detect an abnormal degradation of the reactor coolant pressure boundary. The boron storage volume and concentration requirements contained in Technical Specification Section 3.2 are not considered an initial condition or a primary success path to any design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier. The boron storage volume and concentration requirements currently contained in Technical Specification Section 3.2 are not risk significant and therefore were not considered in the TMI-1 Probabilistic Risk Assessment. Therefore, the Makeup and Purification and Chemical Addition Systems requirements contained in TMI-1 Technical Specification Section 3.2 do not meet any of the above four (4) criteria in the Final Policy Statement as codified by the revision to the 10 CFR 50.36. The proposed change removes an existing action statement (TMI-1 Technical Specification 3.2.2.c) associated with the Chemical Addition System. It is also noted that the specific values for volume and boron concentration for the Chemical Addition System storage tanks are subject to change based on TMI-1 cycle specific core design evaluations. Accordingly, implementation of this change in

accordance with the Final Policy Statement criteria, as codified in 10 CFR 50.36 is expected to produce an improvement in safety through reduced potential action statement induced plant transients, and more efficient use of NRC and industry resources. Therefore, this change is consistent with the intent of the revision to 10 CFR 50.36.

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 administrative relocation of the existing Technical Specification Section 3.2 design requirements for the Makeup and Purification and Chemical Addition Systems to the TMI-1 UFSAR is unrelated to the probability of occurrence or the consequences of an accident previously evaluated. Design basis accident and transient analysis criteria regarding emergency core cooling system (ECCS) cold shutdown boron requirements are maintained in TMI-1 Technical Specification Section 3.3. The requirements currently contained in Technical Specification Section 3.2 do not meet the criteria in the NRC "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," July 1992, as codified by the revision to 10 CFR 50.36. The proposed amendment is expected to produce an improvement in safety through reduced potential action statement induced plant transients. 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. Design basis accident and transient analysis criteria regarding ECCS cold shutdown boron requirements are maintained in TMI-1 Technical Specification Section 3.3. Administrative relocation of the existing Technical Specification Section 3.2 design requirements for the Makeup and Purification and Chemical Addition Systems to the UFSAR ensures that these system requirements and bases are appropriately controlled in accordance with the requirements of 10 CFR 50.59. Therefore, the proposed amendment does not create the possibility of 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 is consistent with the Standard Technical Specifications for Babcock and Wilcox Plants, NUREG-1430, July 1992, and the NRC Final Policy Statement on

Improvements to Technical Specifications. The requirements currently contained in TMI-1 Technical Specification Section 3.2 do not meet any of the four (4) criteria in the Final Policy Statement for inclusion in Technical Specifications, as codified in the revision to 10 CFR 50.36. The proposed amendment is expected to produce an improvement in safety through reduced potential action statement induced plant transients. Administrative relocation of the existing TMI-1 Technical Specification Section 3.2 design requirements for the Makeup and Purification and Chemical Addition Systems to the UFSAR ensures that these system requirements and bases are appropriately controlled in accordance with the requirements of 10 CFR 50.59. 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.

TABLE OF CONTENTS

<u>Section</u>		<u>Page</u>
2	<u>SAFETY LIMITS AND LIMITING SAFETY SYSTEM SETTINGS</u>	2-1
2.1	<u>Safety Limits, Reactor Core</u>	2-1
2.2	<u>Safety Limits, Reactor System Pressure</u>	2-4
2.3	<u>Limiting Safety System Settings, Protection Instrumentation</u>	2-5
3	<u>LIMITING CONDITIONS FOR OPERATION</u>	3-1
3.0	<u>General Action Requirements</u>	3-1
3.1	<u>Reactor Coolant System</u>	3-1a
3.1.1	Operational Components	3-1a
3.1.2	Pressurization, Heatup and Cooldown Limitations	3-3
3.1.3	Minimum Conditions for Criticality	3-6
3.1.4	Reactor Coolant System Activity	3-8
3.1.5	Chemistry	3-10
3.1.6	Leakage	3-12
3.1.7	Moderator Temperature Coefficient of Reactivity	3-16
3.1.8	Single Loop Restrictions	3-17
3.1.9	Low Power Physics Testing Restrictions	3-18
3.1.10	Control Rod Operation	3-18a
3.1.11	Reactor Internal Vent Valves	3-18c
3.1.12	Pressurizer Power Operated Relief Valve (PORV) and Block Valve	3-18d
3.1.13	Reactor Coolant System Vents	3-18f
3.2	<u>Deleted</u>	3-19
3.3	<u>Emergency Core Cooling, Reactor Building Emergency Cooling and Reactor Building Spray Systems</u>	3-21
3.4	<u>Decay Heat Removal Capability</u>	3-25
3.4.1	Reactor Coolant System Temperature Greater than 250°F	3-25
3.4.2	Reactor Coolant System Temperature 250°F or Less	3-26
3.5	<u>Instrumentation Systems</u>	3-27
3.5.1	Operational Safety Instrumentation	3-27
3.5.2	Control Rod Group and Power Distribution Limits	3-33
3.5.3	Engineered Safeguards Protection System Actuation Setpoints	3-37
3.5.4	Incore Instrumentation	3-38
3.5.5	Accident Monitoring Instrumentation	3-40a
3.5.6	Deleted	3-40f
3.6	<u>Reactor Building</u>	3-41
3.7	<u>Unit Electrical Power System</u>	3-42
3.8	<u>Fuel Loading and Refueling</u>	3-44
3.9	<u>Deleted</u>	3-46
3.10	<u>Miscellaneous Radioactive Materials Sources</u>	3-46
3.11	<u>Handling of Irradiated Fuel</u>	3-55
3.12	<u>Reactor Building Polar Crane</u>	3-57
3.13	<u>Secondary System Activity</u>	3-58
3.14	<u>Flood</u>	3-59
3.14.1	Periodic Inspection of the Dikes Around TMI	3-59
3.14.2	Flood Condition for Placing the Unit in Hot Standby	3-60
3.15	<u>Air Treatment Systems</u>	3-61
3.15.1	Emergency Control Room Air Treatment System	3-61
3.15.2	Reactor Building Purge Air Treatment System	3-62a
3.15.3	Auxiliary and Fuel Handling Building Air Treatment System	3-62c
3.15.4	Fuel Handling Building ESF Air Treatment System	3-62e

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