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5211-85-2015

February 20, 1985

Office of Nuclear Reactor Regulation
Attn: J. F. Stolz, Chief
Operating Reactor Branch No. 4
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Dear Mr. Stolz:

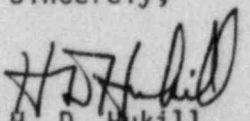
Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Completion of Draft License Condition A.19

Our letters dated March 5, 1984 (5211-84-2062) and March 6, 1984 (5211-84-2064) provided comments on the draft license conditions forwarded by your letter dated February 22, 1984. Since March 1984, we have met with the NRC staff on November 13, 1984 to further discuss the draft license conditions. At the meeting we noted that draft License Condition A.19 was complete and could be deleted. This letter documents how the license condition was addressed and completed.

Tables 21-24 of Revision 3 to the TMI-1 Emergency Plan indicated areas where instrumentation being installed to satisfy NUREG 0578 (now NUREG 0737) requirements would result in further means of determining if Emergency Action Levels (EALs) had been reached. The attached table cross references the modification upgrade to the former Emergency Plan Table item. The improved instrumentation has been installed and has been reflected in the current Emergency Plan and Emergency Plan Implementing Procedures (EPIPs).

Based on this, the draft License Condition has been satisfied and need not be included in the final License Conditions when issued.

Sincerely,


H. D. Hukill
Director, TMI-1

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PDR ADOCK 05000289
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CWS/HDH/spb

cc: R. Conte
J. Van Vliet

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INSTRUMENTATION THAT SATISFIES
DRAFT LICENSE CONDITION A.19*

<u>Rev. 3 of Emergency Plan Items</u>	<u>Modification</u>	<u>E-Plan/EPIP EAL #</u>
Table 21 Item 3a and Table 22 Item 1a	RCS Sampling Up-grade per NUREG 0737 Item II.B.3	21.1.2/3.1.2
Table 21 Item 6a	PORV Position Indication per NUREG 0737 Item II.D.3	21.5.3/3.5.3
Tables 22 and 23 Item 2	Steam Line Noble Gas Monitors RM-G 26 & 27 installed per NUREG 0737 Item II.F.1.1	21.1.1.F/3.1.1.F**
Table 22 Item 13c	Condenser Off Gas RM-A5 (Hi) & RM-G25 installed per NUREG 0737 Items II.F.1.1 and II.F.1.3	21.1.1.A/3.1.1.A 21.5.1.B/3.5.1.B
Table 22 Item 13d, Table 23 Items 9a and 9c and Table 24 Item 2a	Aux. and Fuel Handling Bldg. Exhaust High Range Monitor RM-A8 (Hi) installed per NUREG 0737 Item II.F.1.2	21.1.1.E/3.1.1.E 21.1.4.2.B/3.1.4.2.B 21.2.1./3.2.1
Table 22 Item 13e and Table 23 Items 9b and 9d	Reactor Bldg. Purge Exhaust High Range Monitor/ Containment Radiation Monitors RM-A9 (Hi), RM-G 22, 23, & 24 installed per NUREG 0737 Items II.F.1.1, II.F.1.2 and II.F.1.3	21.1.1.C/3.1.1.C 21.1.4.2.C/3.1.4.2.C 21.1.4.2.F/21.1.4.2.F
Table 23 Item 16	Backup Incore Thermocouple Readout installed per NUREG 0737 Item II.F.2	21.5.2/3.5.2

*Draft License Condition A.19 states:

"19. The Licensee shall modify its Emergency Plan to address changing capabilities of plant instrumentation (See CLI-79-8, 10 NRC 141, 145; PID ¶ 2002).

2002. With respect to long-term order item 4(a), the indicator parameters used by Licensee to trigger the emergency action levels reflect a broad and diverse set of present plant instrumentation. See Licensee Ex. 30, at Tables 21-24; Tr. 13, 780-87 (Giangi). As new instrumentation is installed, Licensee has committed to modify the Emergency Plan Implementing Procedures to reflect the enhanced capabilities of this instrumentation. Licensee Ex. 30, at § 4.7.6.1.7, p. 7-18. Licensee's emergency action level tables indicate with an asterisk where such changes are contemplated. Licensee Ex. 30, at Tables 21-24. We see nothing which would impede the implementation of any such modifications. We find there is reasonable assurance that long-term order item 4(a) will be complied with as new instrumentation makes it appropriate to modify the parameters used to trigger emergency action levels."

**This instrument is not used directly for an EAL. Dose projections are made once steam flow is known or estimated.