

METROPOLITAN EDISON COMPANY

JERSEY CENTRAL POWER & LIGHT COMPANY

AND

PENNSYLVANIA ELECTRIC COMPANY

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

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Operating License No. D. -50

Docket No. 50-289

Technical Specification Change Request No. 216

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

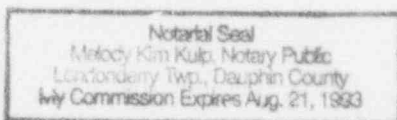
GPU NUCLEAR CORPORATION

BY:

J. S. Brington  
Vice President and Director, TMI-1

Signed and sworn before me this  
24th day of August, 1992.

Melody Kim Kulp  
Notary Public



Member, Pennsylvania Association of Notaries

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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 Chang. Request No. 216 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. Jay H. Kopp, Chairman  
Board of 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

Mr. William P. Dornsife, Acting Director  
PA. Dept. of Environmental Resources  
Bureau of Radiation Protection  
P.O. Box 2063  
Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY: J. Wroughton  
Vice President and Director, TMI-1

DATE: August 24, 1992

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 216

GPUN requests that the attached revised pages replace 3-23 and 3-24 of the TMI-1 Technical Specifications.

II. Reason for the Change

This request involves a change to the Technical Specifications, which will eliminate the requirement to test for operability, each component in Emergency Core Cooling (ECC) systems, immediately prior to removing the redundant component from service for maintenance. Operability will now be based upon the satisfactory completion of surveillance and inservice testing and inspection required by Technical Specification Section 4.2 and 4.5. TMI-1 Technical Specification 3.3.4 presently requires that prior to initiating maintenance on any of the components addressed in Technical Specification 3.3.1, the redundant component shall be tested to assure operability. This is an unnecessary requirement, in that all ECC systems and components are tested periodically to assure their operability.

In order to assure that redundant components are operable, without testing, the completion of normally scheduled surveillance testing and inservice inspection and testing activities shall be verified prior to removing an Emergency Core Cooling System component from service for maintenance. The testing requirements to be accomplished for ECC Systems are as specified in Technical Specifications 4.2 and 4.5.

III. Safety Evaluation Justifying the Change

In order to verify that Emergency Core Cooling System components are operable prior to removing one of two redundant components from service for maintenance, TMI-1 Technical Specifications require that the redundant component be tested to verify its operability. This requirement is unnecessary in that all ECC systems and components are tested periodically to assure their operability in accordance with Section 4 of the Technical Specifications. In addition, in some instances, testing of these components could be considered to render the redundant component inoperable. The operability of ECC Systems, particularly the injection systems, core flood systems, reactor building spray, reactor building emergency cooling and cooling water systems which are described in Section 3.3.1 are verified by the associated surveillance testing requirements specified in Technical Specification Sections 4.2 and 4.5. The periodic satisfactory completion of these surveillance tests assures that the associated systems and components are operable. Further additional testing does not add increased assurance that the redundant component will operate satisfactorily when a component is temporarily removed from service for maintenance activities.

The change to Technical Specification Section 3.3.4 to verify operability of redundant components based on satisfactory completion of surveillance test activities specified in Sections 4.2 and 4.5 will not result in a reduction in the level of assurance that redundant components are operable when like systems and components are undergoing maintenance activities. Deletion of the "test for operability" requirement will also assure that unnecessary testing which causes additional cycling of mechanical and electrical equipment is not accomplished. Additionally, the current Standard Technical Specifications for B&W reactor plants (NUREG-0103,

Revision 4) and the Revised Standard Technical Specifications (Draft NUREG-1430), which are in final review, do not contain a requirement to "test for operability" immediately prior to removing ECC System components from service for maintenance activities.

#### IV. No Significant Hazards Consideration

Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant operations. The elimination of the requirement to test components for operability immediately prior to removing the redundant component from service for maintenance will be replaced by the requirement to verify that the appropriate surveillance has been completed in accordance with Technical Specification 4.2 and 4.5. This requirement is consistent with Standard Technical Specifications. GPUN has determined that this Technical Specification Change Request poses no significant hazards as defined by 10 CFR 50.92. Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant operations as evaluated below:

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. ECC Systems and equipment will be verified to be operable prior to removing redundant equipment from service for maintenance. A review and verification of completed surveillance and inservice test and inspection activities shall be accomplished which will ensure the same or greater level of verification of operability as previous testing.
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 previously evaluated. The proposed amendment does not modify plant operation or methods of conducting maintenance activities. ECC systems and equipment will continue to be required to be operable when redundant equipment is removed from service for maintenance activities. The facility will continue to be operated within the limits of the existing accident analysis and margins of safety.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety since the change contained in the proposed amendment does not change and existing safety margins.

#### V. Implementation

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