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October 29, 1985
NRC/TMI 85-082

Docket No. 50-320

Mr. F. R. Standerfer
Vice President/Director TMI-2
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Dear Mr. Standerfer:

Subject: Commencement of Three Mile Island Unit 2 Preliminary Defueling Operations

In a letter dated October 24, 1985, General Public Utilities Nuclear (GPUN) requested Nuclear Regulatory Commission (NRC) approval to begin certain preliminary defueling activities prior to receiving final approval for the commencement of full defueling operations. Subsequent to this written request GPUN further modified the scope of proposed preliminary defueling activities. These modifications were informally transmitted to the NRC onsite staff. As proposed, preliminary defueling activities will be conducted entirely within the reactor vessel and comprise a relatively small part of the activities proposed by GPUN in the Early Defueling Safety Evaluation Report, currently under review by NRC.

As described in your letter and in subsequent discussions with your staff, the preliminary defueling activities will specifically consist of the following: rearrangement of core debris within the reactor vessel to allow complete installation and rotation of the Canister Positioning System and to provide access for defueling tools; and identification and positioning of core debris samples in the vessel. It is also our understanding that general movement of core debris will include the loading of debris baskets, but that no defueling canisters will be inserted into the reactor vessel and no fuel or core debris will be removed from the reactor vessel.

The use of hydraulically-powered defueling tools has been contingent upon the satisfactory testing of the borated hydraulic fluid to demonstrate its miscibility, compatibility with canister recombiner catalyst and stability as a homogeneous borated fluid. The staff has reviewed your test findings on hydraulic fluid and determined that the proposed hydraulic fluid can be used without undue risk relative to criticality and catalyst degradation.

The operation of the Defueling Water Cleanup System (DWCS) in support of preliminary defueling activities is currently precluded until resolution of

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all quality assurance issues concerning the use of the first four filter canisters and subsequent staff approval is given to the Canister Technical Evaluation Report (TER) and DWCS TER. Completion of NRC staff review of these issues is currently pending our receipt of GPUN's response to NRC questions forwarded in my letter of October 17, 1985.

Based on the enclosed safety evaluation and the NRC licensing of five (5) Fuel Handling Senior Reactor Operators (FHSRO's), we approve the proposed preliminary defueling activities described herein. These activities may commence upon staff approval of the applicable defueling procedures pursuant to Technical Specification 6.8.2.

Sincerely,
ORIGINAL SIGNED by:
William D. Travers

William D. Travers
Acting Director
TNI Program Office
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc: T. F. Demmitt
R. E. Rogan
S. Levin
W. H. Linton
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