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US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

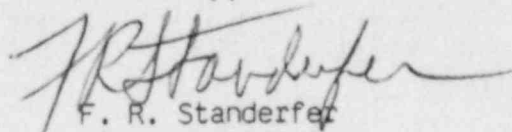
Dear Sirs:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Recovery Operations Plan Change Request No. 43

Attached for NRC review and approval is Recovery Operations Plan Change Request (ROPCR) No. 43. This proposal modifies the surveillance and action statement requirements for the Waste Handling and Packaging Facility Exhaust Monitor in Table 4.3-3 of the Recovery Operations Plan.

Per the requirements of 10 CFR 170, an application fee of \$150.00 is enclosed.

Sincerely,


F. R. Standerfer
Director, TMI-2

RDW/emf

Attachment

Enclosed: GPU Nuclear Corp. Check No. 010336

cc: TMI-1. NRC Resident Inspector - R. J. Conte
Regional Administrator, Region 1 - W. T. Russell
Director, TMI-2 Cleanup Project Directorate - Dr. W. D. Travers

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Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320

Recovery Operations Plan Change Request (ROPCR) No. 43

The Licensee requests that the attached pages 4.3-4a and 4.3-5a of the Recovery Operations Plan (ROP) replace the existing pages 4.3-4a and 4.3-5a. This change request proposes to revise the surveillance and action statement requirements for the Waste Handling and Packaging Facility (WHPF) exhaust monitor based on current plans to replace the AMS-3 in the WHPF with a Particulate Iodine Noble Gas (PING) 2A Monitor.

Description of Change

The proposed revision to the surveillance frequencies for the WHPF exhaust monitor in Table 4.3-3 of the ROP is described below:

- o The channel calibration frequency has been revised from a semi-annual (SA) basis to a once per 18 month frequency (R).
- o The channel functional test has been revised from a weekly (W) basis to a monthly (M) basis.

The action statement for the WHPF exhaust monitor has been revised to state: "With less than one channel operable, effluent releases via the affected pathway may continue for up to thirty (30) days provided that samples are continuously collected with auxiliary sampling equipment within the WHPF. These auxiliary filter samples will be changed daily and a gamma scan performed within 24-hours. After completion of the gamma scan, an analysis for gross alpha, gross beta, and Sr/Y-90 activities will be completed within 96 hours."

Reason for Change

The AMS-3 monitor in the WHPF Ventilation System is being replaced with a PING 2A monitor which enhances the reliability and monitoring capability of the WHPF Ventilation System exhaust pathway. Thus, the change request proposes to revise the surveillance frequencies and action statement for the WHPF exhaust monitor to be consistent with that of other PING monitors (e.g., HPR-221A, HPR-221B, EPICOR II Ventilation System radiation monitor).

Safety Evaluation Justifying Change

The current WHPF exhaust monitor consists of an AMS-3 unit. The requirements for the use of a WHPF exhaust monitor in Table 4.3-3 of the ROP were proposed via ROPCR No. 36 submitted via GPU Nuclear letter 4410-86-L-0035, dated April 16, 1986. This proposal was approved by the NRC via Recovery Operations Plan Change No. 34 (reference NRC Letter NRC/TMI-86-068, dated July 10, 1986). The referenced NRC letter also approved the initial submittal of the Technical Evaluation Report (TER) for the WHPF submitted via GPU Nuclear letter 4410-85-L-0128, dated November 12, 1985. It is noteworthy that the referenced NRC and GPU Nuclear letters do not specify the type of radiation monitors to be utilized in the WHPF Ventilation.

The replacement of an AMS-3 monitor with a PING 2A monitor will enhance the reliability and monitoring capability of the WHPF Ventilation System exhaust pathway. Specifically, AMS-3 units are more appropriately suited for sampling room or ambient air where there is a potential for airborne radioactivity. A PING unit is specifically designed for sampling of HVAC systems and provides a better detection response capability than an AMS-3 monitor.

The proposed revised surveillance frequencies and action statement for the WHPF exhaust monitor are based on similar requirements for other PING monitors in the TMI-2 Technical Specifications and ROP. Because the AMS-3 is capable of monitoring only particulates, only the particulate channel of the PING is required to be used and surveilled. Surveillance of the iodine or noble gas source terms is not required as these sources are not present in the WHPF.

The WHPF exhaust monitor will continue to maintain the same functions as specified in the WHPF TER. Thus, the proposed ROPCR will continue to assure adequate monitoring of the WHPF Ventilation System exhaust pathway.

10 CFR 50.59 Evaluation

The planned replacement of the AMS-3 monitor with a PING 2A monitor in the WHPF Ventilation System will improve the monitoring capability of the exhaust. The PING 2A unit provides a better monitoring and detection response capability since it is specifically designed for HVAC systems. Thus, this change request does not increase the probability or consequences of an accident previously evaluated, or reduce the margin of safety of any Technical Specification. Therefore, pursuant to 10 CFR 50.59, this proposed change does not result in an unreviewed safety question.

Amendment Class

Per the requirements of 10 CFR 170, an application fee of \$150.00 is enclosed.