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September 21, 1995

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U. S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inservice Testing of ASME Code Class 1, 2, and 3 Pumps and Valves
(IST) - Program for the Third Ten Year Interval

In accordance with 10 CFR 50.55a(f), attached is GPU Nuclear's update of the TMI-1 program for Inservice Testing of ASME Code Class 1, 2, and 3 Pumps and Valves (IST) for the third 10-year interval. The TMI-1 Inservice Inspection (ISI) program required by 10 CFR 50.55a(g) is currently scheduled to end on April 19, 2001 and is not affected by this IST program update¹.

In accordance with 10 CFR 50.55a(b)(2)(viii), the attached program has been developed using the applicable parts (Parts OM-6 and OM-10) of the ASME/ANSI OMa-1988 Addenda to ASME/ANSI OM-1987 Edition as required by the ASME Section XI Division I, 1989 Edition. Included are requests for relief from Code requirements which include 1) Code requirements that have been determined to be impractical for TMI-1 in accordance with §50.55a(f)(5)(iii) and 2) alternatives proposed in accordance with §50.55a(a)(3).

The third 10-year IST interval will run from September 22, 1995 to September 22, 2005. This schedule reflects an extension of the second 10-year IST interval as approved by the NRC in a letter dated September 22, 1994.

GL 89-04, Supplement 1, "Guidance on Developing Acceptable Inservice Testing Programs" advised licensees of the recommendations in NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants," in developing and implementing IST Programs. The guidance of

¹ The ASME Section XI Code permitted an extension of the first 10-year interval for ISI due to the extended shutdown of TMI-1 following the accident at TMI-2 for approximately six and one half years. Because the extension was not allowed for IST, the 10-year intervals for the two programs do not coincide.

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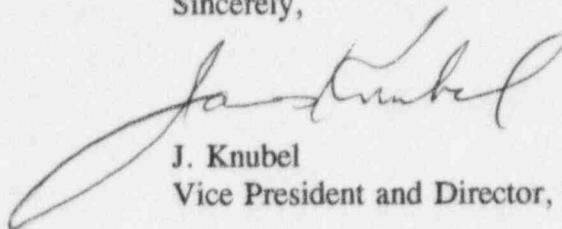
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NUREG-1482 was used extensively in preparing the new IST program.

GPU Nuclear had addressed Generic Letter (GL) 89-04 in a letter dated December 3, 1990. In that letter and in a subsequent letter dated June 24, 1992, we took exception to Position No. 8 of the GL, which involves declaring equipment inoperable based on test data falling within the Required Action range without allowing the additional time to investigate more fully as provided by the Code. The revised IST program includes the components that were added to address GL 89-04 and incorporates additional changes to implement Position No. 8. Therefore, no exception to that position is being taken with regard to the revised IST Program for the third 10-year interval.

Four sets of drawings, TMI-1 ISI Boundary Drawings along with the associated Piping and Instrumentation Drawings (P&IDs), are being provided to the NRC Senior Project Manager to facilitate NRC review of this submittal.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. Knubel", written in dark ink.

J. Knubel
Vice President and Director, TMI

Enclosure

cc: Administrator, Region I
TMI-1 Senior Project Manager
TMI Senior Resident Inspector