



GPU Nuclear Corporation
Post Office Box 480
Route 441 South
Middletown, Pennsylvania 17057-0191
717 944-7621
TELEX 84-2386
Writer's Direct Dial Number:

(717) 948-8400

January 18, 1993
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US Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Proposed License Amendment and
Post-Defueling Monitored Storage Safety Analysis Report Amendment 16

Dear Sir:

GPU Nuclear letter C312-91-2080, dated October 9, 1991, provided the Proposed License Amendment for TMI-2 in the Post-Defueling Monitored Storage (PDMS) condition. This letter provides a modification to the proposed License Amendment which revises the Possession Only License (POL) to be applicable in the current condition of TMI-2 (i.e., Facility Mode 3) and allows for transition from Mode 3 to PDMS without an additional license amendment. The justification for these changes and one signed copy of the Certificate of Service for the modification to the proposed amended license are included.

Amendment 16 to the PDMS Safety Analysis Report (SAR) Technical Specifications is also attached. This amendment includes the addition of the surveillance requirement for the unfiltered leak rate test and a change to the reporting requirements for the 10 CFR 50.59, PDMS SAR update, and radioactive effluent release reports. Also included are minor corrections and clarifications. Revisions to the main SAR text are submitted as page changes.

Sincerely,

R. L. Long
Director, Corporate Services/TMI-2

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EDS/dlb
cc: See page 2

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PDR

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cc: T. T. Martin - Regional Administrator, Region I
M. T. Masnik - Project Manager, PDNP Directorate
L. H. Thonus - Project Manager, TMI
F. I. Young - Senior Resident Inspector, TMI

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
PENNSYLVANIA ELECTRIC COMPANY
GPU NUCLEAR
THREE MILE ISLAND NUCLEAR STATION UNIT II

Operating License No. DPR-73
Docket No. 50-320
Proposed Possession Only License and
Proposed Post-Defueling Monitored Storage Technical Specifications

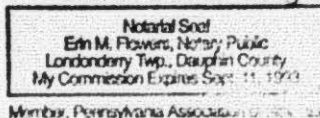
The proposed Possession Only License and the proposed Post-Defueling Monitored Storage Technical Specifications are submitted in support of Licensee's request to change Operating License No. DPR-73 for Three Mile Island Nuclear Station Unit 2.

GPU NUCLEAR

By Robert A. Long
Director, Corporate Services
Director, TMI-2

Sworn and subscribed to me this 18th day of January, 1993.

Erin M. Flowers
Notary Public



METROPOLITAN EDISON COMPANY

JERSEY CENTRAL POWER AND LIGHT COMPANY

PENNSYLVANIA ELECTRIC COMPANY

GPU NUCLEAR CORPORATION

DOCKET NO. 50-320

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

POSSESSION ONLY LICENSE

License No. DPR-73

- I. The Nuclear Regulatory Commission (the Commission) having found that:
 - A. The application for the Possession Only License filed by Metropolitan Edison Company, Jersey Central Power and Light Company, Pennsylvania Electric Company, and GPU Nuclear Corporation (the Licensees) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I, and all required notifications to other agencies or bodies have been duly made;
 - B. The facility will be maintained in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance: (i) that the activities authorized by this Possession Only License can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;
 - D. GPU Nuclear Corporation is technically qualified to engage in the activities authorized by this Possession Only License in accordance with the rules and regulations of the Commission;
 - E. The Licensees are financially qualified to engage in the activities authorized by this Possession Only License in accordance with the rules and regulations of the Commission;
 - F. The Licensees have satisfied the applicable provisions 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;

- G. The issuance of this Possession Only License will not be inimical to the common defense and security or to the health and safety of the public;
 - H. After weighing the environmental, economic, technical, and other benefits of the facility against environmental, and other costs and considering available alternatives, the issuance of Possession Only License No. DPR-73 subject to the conditions for protection of the environment set forth herein is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied; and
 - I. The possession of byproduct and special nuclear material and receipt, possession, and use of source material as authorized by the license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40, and 70, including 10 CFR Sections 30.33, 40.32, 70.23, and 70.31.
2. Possession Only License No. DPR-73 dated _____, is hereby issued to Metropolitan Edison Company, Jersey Central Power and Light Company, Pennsylvania Electric Company, and GPU Nuclear Corporation to read as follows:
- A. This license applies to the Three Mile Island Nuclear Station, Unit 2, (the facility) owned by the Metropolitan Edison Company, Jersey Central Power and Light Company, and Pennsylvania Electric Company, and maintained by the GPU Nuclear Corporation. The facility is located on Three Mile Island in the Susquehanna River, in Londonderry Township, Dauphin County, Pennsylvania, about ten miles southeast of Harrisburg. Prior to entry into Post-Defueling Monitored Storage (PDMS), the facility is described in the Final Safety Analysis Report as supplemented and amended, the various Recovery System Descriptions and Technical Evaluation Reports, and the Environmental Report as supplemented and amended. Upon entry into PDMS, the facility is described in the PDMS Safety Analysis Report as supplemented and amended and the Environmental Report as supplemented and amended.
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:
 - (1) GPU Nuclear Corporation, pursuant to Section 103 of the Act and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess but not operate the facility;
 - (2) GPU Nuclear Corporation, Metropolitan Edison Company, Jersey Central Power and Light, and Pennsylvania Electric Company to possess the facility at the designated location in Dauphin County, Pennsylvania, in accordance with the procedures and limitations set forth in this license;

- (3) GPU Nuclear Corporation, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any sealed sources for radiation monitoring equipment calibration;
- (4) GPU Nuclear Corporation, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis or instrument calibration or associated with radioactive apparatus or components; and
- (5) GPU Nuclear Corporation, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials which remain at the facility subsequent to the cleanup following the March 28, 1979, accident.

C. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations in 10 CFR Chapter I, except as exemptions have been granted: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, sections 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; and is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Technical Specifications

Prior to and until entry into PDMS, the Recovery Technical Specifications contained in Appendices A and B, as revised through Amendment No. 42, are hereby incorporated in the license. Upon entry into PDMS, the Technical Specifications contained in PDMS Appendix A issued as Amendment No. 0 are incorporated in the license. The Licensee shall maintain the facility in accordance with the Technical Specifications and all Commission Orders issued subsequent to the date of this Possession Only License.

D. This license is effective as of the date of issuance and shall expire at midnight, April 19, 2014.

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

Proposed License Amendment

The Licensee requests that the attached changed pages of the proposed Possession Only License (POL) replace the corresponding pages in the proposed License Amendment submitted via GPU Nuclear letter C312-91-2080, dated October 9, 1991.

Description of Change

The change evaluated here is the inclusion of Facility Mode 3 in the proposed POL.

Reason for Change

Issuance of the TMI-2 POL does not depend upon entry into Post-Defueling Monitored Storage (PDMS). In fact, after the accident, the Commission suspended GPU Nuclear's authority to operate TMI-2, except in its shutdown condition. Therefore, this request for a POL that is applicable to Facility Mode 3 and PDMS is consistent with the current licensing basis and facilitates the transition from Mode 3 to PDMS.

Safety Evaluation Justifying Change

TMI-2 is currently in Facility Mode 3, which is defined by the Recovery Technical Specifications as the condition wherein the TMI-2 Reactor Vessel and Reactor Coolant System are defueled to the extent reasonably achievable, the possibility of criticality in the Reactor Building is precluded, and no canisters containing core material are stored on the TMI-2 site. TMI-2 is not an operating plant; it has been in Mode 3 since April 27, 1991. The proposed Possession Only License requires adherence to the same regulatory requirements as the current Operating License. Therefore, no reduction in attention to safety will occur as a result of this license amendment request.

No Significant Hazards Consideration

10 CFR 50.92 provides the criteria which the Commission uses to perform a No Significant Hazards Consideration. 10 CFR 50.92 states that an amendment to a facility license involves No Significant Hazards if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or

3. Involve a significant reduction in a margin of safety.

The proposed inclusion of Facility Mode 3 in the POL does not involve any physical changes to the facility. This is primarily an administrative change. Based on this, GPU Nuclear concludes that the proposed change does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The previous accident evaluations would be applicable regardless of whether TMI-2 is governed by an operating license or a POL. No effect on these evaluations results from this proposed license amendment. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated. As previously stated, including Facility Mode 3 in the POL does not involve any physical changes to the facility and therefore, the possibility of a new or different kind of accident is not created.
3. Involve a significant reduction in a margin of safety during PDMS. The margins of safety currently applicable to TMI-2 Facility Mode 3 apply whether TMI-2 is governed by an operating license or a POL. No change to any margin of safety results from this proposed license amendment. Therefore, there will not be a reduction in the margin of safety.

Based on the above analysis, it is concluded that the proposed changes involve No Significant Hazards Considerations as defined by 10 CFR 50.92.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NO. 50-326
LICENSE NO. DPR-73

GPU NUCLEAR

This is to certify that a copy of this revision to the proposed Possession Only License for Three Mile Island Nuclear Station Unit 2 has been filed with the U.S. Nuclear Regulatory Commission and served to the chief executives of 1) Londonderry Township, Dauphin County, Pennsylvania; 2) Dauphin County, Pennsylvania; and 3) the designated official of the Commonwealth of Pennsylvania by deposit in the United States mail, addressed as follows:

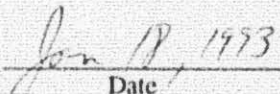
Mr. Jay H. Kopp, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Mr. Russell L. Sheaffer, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Court House
Harrisburg, PA 17120

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

GPU NUCLEAR

By 
Director, Corporate Services/TM/2


Date

**POST-DEFUELING MONITORED STORAGE
SAFETY ANALYSIS REPORT
AMENDMENT 16**

POST-DEFUELING MONITORED STORAGE SAFETY ANALYSIS REPORT

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1.0 DEFINITIONS

FREQUENCY NOTATION

1.8 The FREQUENCY NOTATION specified for the performance of surveillance requirements shall correspond to the intervals defined in Table 1.1.

CONTAINMENT ISOLATION

1.9 CONTAINMENT ISOLATION shall exist when:

- a. Each penetration is:
 1. Closed by a manual valve, a welded or bolted blind flange, a deactivated automatic valve secured in the closed position or other equivalent mechanical closure to provide isolation of each penetration, or
 2. Open and the pathway to the environment provided with a HEPA filter, or
 3. Open in accordance with approved procedures. Controls shall be implemented to minimize the time the penetration is allowed open and to specify the conditions for which the penetration is open. Penetrations shall be expeditiously closed upon completion of the conditions specified in the approved procedures, and
- b. The Equipment Hatch is closed, and
- c. Each Containment Airlock is operable pursuant to Technical Specification 3.1.1.3.

BATCH RELEASE

1.10 A BATCH RELEASE is the discharge of a discrete volume.

CONTINUOUS RELEASE

1.11 A CONTINUOUS RELEASE is the discharge of a non-discrete volume, e.g., from a volume or system that has an input flow during the continuous release.

OFF-SITE DOSE CALCULATION MANUAL

1.12 The OFF-SITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of off-site doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip setpoints, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the programs required by Section 6.7.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.8.1.2 and 6.8.1.3.

3/4.1 CONTAINMENT SYSTEMS

3/4.1.1 PRIMARY CONTAINMENT

CONTAINMENT ISOLATION

LIMITING CONDITIONS FOR PDMS

3.1.1.1 Primary CONTAINMENT ISOLATION shall be maintained.

APPLICABILITY: PDMS

ACTION:

With CONTAINMENT ISOLATION not in accordance with requirements, restore CONTAINMENT ISOLATION within 24 hours.

SURVEILLANCE REQUIREMENTS

4.1.1.1 Primary CONTAINMENT ISOLATION shall be verified quarterly with the following exceptions:

- a. Isolation valves that are locked closed shall be verified annually on a quarterly STAGGERED TEST BASIS. If a valve is found to be out of position, a check of all locked closed isolation valves shall be performed.
- b. An independent verification of all isolation valve position changes shall be performed.
- c. Bolted or welded blind flanges which form a containment isolation boundary and the Equipment Hatch shall be visually inspected for signs of degradation and/or leakage every five years on an annual STAGGERED TEST BASIS. If a problem is discovered with a flange, a check of all bolted or welded blind flanges shall be performed.

UNFILTERED LEAK RATE TESTING

LIMITING CONDITIONS FOR PDMS

3.1.1.2 The unfiltered leak rate from Containment with the RB Breather closed shall be less than 1/100 of the rate through the RB Breather.

APPLICABILITY: PDMS

ACTION:

If the unfiltered leak rate from Containment with the RB Breather closed is greater than 1/100 of the rate through the RB Breather or if the trend indicates that the 1/100 value will be exceeded within one year, then:

- a. Identify the excessive leakage path;
- b. Make necessary repairs and/or adjustments;
- c. Perform an additional unfiltered leak rate test; and
- d. Prepare and submit a special report to the Commission pursuant to Specification 6.8.2 within the next 30 days.

SURVEILLANCE REQUIREMENTS

4.1.1.2 The initial unfiltered leak rate test shall be performed two years following entry into PDMS. After the initial unfiltered leak rate test, the test frequency will be determined by comparing the ratios of the unfiltered leak rate to the RB Breather leak rate from previous and current tests. If the test results indicate that the ratio of unfiltered leakage to breather leakage is remaining constant or decreasing, then the next interval shall be five years.

SURVEILLANCE REQUIREMENTS

4.1.1.2 (con't)

If the test results indicate that the ratio of unfiltered leakage to breather leakage is increasing, i.e., the current ratio is greater than the previous ratio, then the next interval shall be determined by the following equation:

$$N' = N \times \left[\frac{(0.01 - R_p)}{(R_c - R_p)} - 1 \right]$$

where:

N'	=	the next test interval,
N	=	the current test interval,
R_p	=	the previous ratio of unfiltered leakage to RB Breather leakage
R_c	=	the current ratio of unfiltered leakage to RB Breather leakage

The initial value of N shall equal two years. N' shall be the truncated integer result from the above equation, in years, but not more than five years nor less than one year.

CONTAINMENT AIR LOCKS

LIMITING CONDITIONS FOR PDMS

3.1.1.3 Each Containment Air Lock shall be OPERABLE with at least one door closed except when the air lock is being used for transit entry and exit in accordance with site-approved procedures.

APPLICABILITY: PDMS

ACTION:

With no Containment Air Lock door OPERABLE, restore at least one door to OPERABLE status within 24 hours.

SURVEILLANCE REQUIREMENTS

4.1.1.3 Each Containment Air Lock shall be demonstrated OPERABLE at least once per three months by performing a mechanical operability check of each Air Lock Door, including a visual inspection of the components and lubrication if necessary and by visually inspecting the door seals for significant degradation. When both Containment Air Lock doors are opened simultaneously, verify the following conditions:

- a. The capability exists to expeditiously close at least one Air Lock door;
- b. The Air Lock doors and Containment Purge are configured to restrict the outflow of air in accordance with site-approved procedures; and
- c. The Air Lock doors are cycled to ensure mechanical operability within seven days prior to opening both doors.

3/4.5 SEALED SOURCES

BASES

3/4.5.1 SEALED SOURCE INTEGRITY

The limitation on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and Special Nuclear Material sources will not exceed allowable intake values.

ADMINISTRATIVE CONTROLS

6.7 PROCEDURES AND PROGRAMS (con't)

1. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
2. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of the census, and
3. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.8 REPORTING REQUIREMENTS

ROUTINE REPORTS

6.8.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be in accordance with 10 CFR 50.4 unless otherwise noted. Some of the reporting requirements of Title 10, Code of Federal Regulations are repeated below.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.8.1.1 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.8.1.2 The Annual Radiological Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

ADMINISTRATIVE CONTROLS

6.8 REPORTING REQUIREMENTS (con't)

ANNUAL REPORTS¹

6.8.1.3 Annual reports covering the activities of the unit as described below during the previous calendar year shall be submitted prior to March 1 of each year.

Reports required on an annual basis shall include:

- a. A tabulation of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated person-rem exposure according to work and job functions², e.g., surveillance, routine maintenance, special maintenance (the dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements). Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.

BIANNUAL REPORTS

6.8.1.4 Biannual reports (i.e., once every two years) covering the activities of the unit as described below during the previous two calendar years shall be submitted prior to March 1 of every other year.

Reports required on a biannual basis shall include:

- a. All changes made to the PDMS SAR during the previous two calendar years.
- b. All changes, tests, or experiments meeting the requirements of 10 CFR 50.59.

SPECIAL REPORTS

6.8.2 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

6.8.3 NONROUTINE REPORTS

A report shall be submitted in the event that an Exceptional Occurrence as specified in Section 6.13 occurs. The report shall be submitted under one of the report schedules described below.

¹ A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

² This tabulation supplements the requirements of Article 20.407 of 10 CFR 20.

ADMINISTRATIVE CONTROLS

6.8 REPORTING REQUIREMENTS (con't)

PROMPT REPORTS

6.8.3.1 Those events specified as prompt report occurrences shall be reported within 24 hours by telephone, telegraph, or facsimile transmission to the NRC followed by a written report to the NRC within 30 days.

THIRTY DAY EVENT REPORTS

6.8.3.2 Nonroutine events not requiring a prompt report as described in Subsection 6.8.3.1, shall be reported to the NRC either within 30 days of their occurrence or within the time limit specified by the reporting requirement of the corresponding certification or permit issued pursuant to Sections 401 or 402 of PL 92-500, the Federal Water Pollution Control Act (FWPCA) Amendment of 1972, whichever time duration following the nonroutine event shall result in the earlier submittal.

CONTENT OF NONROUTINE REPORTS

6.8.3.3 Written 30-day reports and, to the extent possible, the preliminary telephone, telegraph, or facsimile reports shall (a) describe, analyze, and evaluate the occurrence, including extent and magnitude of the impact, (b) describe the cause of the occurrence, and (c) indicate the corrective action (including any significant changes made in procedures) taken to preclude repetition of the occurrence and to prevent similar occurrences involving similar components or systems.

6.9 RECORD RETENTION

6.9.1 The following records shall be retained for at least five years:

- a. Records of sealed source and fission detection leak tests and results.
- b. Records of annual physical inventory of all sealed source material of record.

6.9.2 The following records shall be retained as long as the Licensee has an NRC license to operate or possess the Three Mile Island facility.

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety and radioactive waste systems.
- c. ALL REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.

ADMINISTRATIVE CONTROLS

6.9 RECORD RETENTION (Con't)

- e. Records of changes made to the procedures required by Recovery Technical Specification 6.8.1 and PDMS Technical Specification 6.7.1.
- f. Radiation Safety Program Reports and Quarterly Recovery Progress Reports on the March 28, 1979 incident.
- g. Records of radioactive shipments.
- h. Records and logs of radioactive waste systems operations.
- i. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Safety Analysis Report, TER, SD, or Safety Evaluation previously submitted to NRC.
- j. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- k. Records of transient or operational cycles for those unit components designed for a limited number of transients or cycles.
- l. Records of reactor tests and experiments.
- m. Records of training and qualification for current members of the unit staff.
- n. Records of in-service inspections previously required by the Technical Specifications.
- o. Records of Quality Assurance activities required by the Operating, Recovery, or PDMS Quality Assurance Plans.
- p. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- q. Records of meetings of the Plant Operation Review Committee (PORC) and the Generation Review Committee (GRC), and reports of evaluations prepared by the IOSRG, if applicable to TMI-2.
- r. Records of the incident which occurred on March 28, 1979.
- s. Records of unit radiation and contamination surveys.
- t. Records of radiation exposure for all individuals entering radiation control areas.

ADMINISTRATIVE CONTROLS

6.9 RECORD RETENTION (Con't)

- u. Records of gaseous and liquid radioactive material released to the environs.
- v. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL.

6.10 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.11 HIGH RADIATION AREA

In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area shall be controlled as specified in the Radiation Protection Plan.

6.12 OFFSITE DOSE CALCULATION MANUAL (ODCM)

SUBSTANTIVE CHANGES to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.9.2 v. This documentation shall contain:
 - 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by GPU Nuclear management.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

ADMINISTRATIVE CONTROLS

6.13 EXCEPTIONAL OCCURRENCES

UNUSUAL OR IMPORTANT ENVIRONMENTAL EVENTS

6.13.1 Any occurrence of an unusual or important event that causes or could potentially cause significant environmental impact causally related with station operation shall be recorded and reported to the NRC per Subsection 6.8.3.1. The following are examples of such events: excessive bird impaction events on cooling tower structures or meteorological towers (i.e., more than 100 in any one day); onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills near or downstream of the site.

EXCEEDING LIMITS OF RELEVANT PERMITS

6.13.2 Any occurrence of exceeding the limits specified in relevant permits and certificates issued by other Federal and State agencies which are reportable to the agency which issued the permit shall be reported to the NRC in accordance with the provisions of Subsection 6.8.3.2. This requirement shall apply only to topics of National Environmental Protection Act (NEPA) concern within the requirements of the permits and certificates noted in Section 6.15.

6.14 STATE AND FEDERAL PERMITS AND CERTIFICATES

Section 401 of PL 92-500 requires any applicant for a Federal license or permit to conduct any activity which may result in any discharge into navigable waters to provide the licensing agency a certification from the State having jurisdiction that the discharge will comply with applicable provisions of Sections 301, 302, 306, and 307 of the FWPCA. Section 401 of PL 92-500 further requires that any certification provided under this section shall set forth any effluent limitations and other limitations, and monitoring requirements necessary to assure that any applicant for a Federal license or permit will comply with the applicable limitations. Certifications provided in accordance with Section 401 set forth conditions on the Federal license or permit for which the certification is provided. Accordingly, the licensee shall comply with the requirements set forth in the certification dated November 9, 1977 or its currently applicable revision, issued to the licensee by the Pennsylvania Department of Environmental Resources, which requires, among other things, that the licensee comply with effluent limitations stipulated in the NPDES PERMIT.

ADMINISTRATIVE CONTROLS

6.14 STATE AND FEDERAL PERMITS AND CERTIFICATES (con't)

Changes or addition to the required Federal and State permits and certificates for the protection of the environment noted in this subsection shall be reported to the NRC within 30 days. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Sections 401 and 402 of PL 92-500, NRC shall be notified concurrently with the authorizing agency. The notification to the NRC shall include an evaluation of the environmental impact of the revised requirement, limit or value being sought.

If, during NRC's review of the proposed change, it is determined that a potentially severe environmental impact could result from the change, the NRC will consult with the authorizing agency to determine the appropriate action to be taken.