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5928-03-20167
08/07/2003

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

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT 2 (TMI-2)
POSSESSION ONLY LICENSE NO. DPR-73
DOCKET NO. 50-320
UPDATE 5 OF THE POST-DEFUELING MONITORED STORAGE SAFETY ANALYSIS REPORT

Dear Sirs:

Enclosed are the revised pages associated with Update 5 of the Post-Defueling Monitored Storage Safety Analysis Report (PDMS SAR) for TMI-2. The last revision of the PDMS SAR was issued as Update 4 on August 10, 2001. Update 5 revises the PDMS SAR to reflect the current plant configuration and administrative processes. The revised pages are indicated on the list of effective pages, which should be kept in the front of the binder containing the PDMS SAR. Also included are binder sleeves for Update 5. Changes made from Update 4 to Update 5 of the PDMS SAR are identified by bold face type within the document, and a bold line vertically drawn in the margin adjacent to the portion actually changed.

GPU Nuclear will issue the next revision of the PDMS SAR no later than 24 months from the date of this submittal.

1/10
NMSS01

5928-03-20167
08/07/2003

Please contact Adam Miller of TMI-1 Regulatory Assurance at (717) 948-8128 if you have any questions regarding Update 5 to the PDMS SAR.

Sincerely,

James J. Byrne
GPU Nuclear, Vice President, TMI, Unit 2

JJB/awm

cc: USNRC TMI-2 Region I Inspector
USNRC TMI-2 Project Manager
NRC Regional Administrator, Region I
Ten (10) Copies to DCD
File 03055

TMI-2

POST DE-FUELING

MONITORED STORAGE

SAFETY ANALYSIS

REPORT

UPDATE 5
August 2003

TMI-2 POST-DEFUELING MONITORED STORAGE

SAFETY ANALYSIS REPORT

UPDATE 5
AUGUST 2003

August 12, 2003

UNIT 2 PDMS Safety Analysis Report Instruction Memorandum
UPDATE 5

CORRECT ADDRESS IF NECESSARY

RETURN TO: Debbie Marshbank, Procedure Distribution Control, South Office Building

Please update your Unit 2 PDMS SAR Update 5 with the Attachments as instructed below. Also, please sign the acknowledgement at the bottom of this memo and return to Debbie Marshbank at the address shown above.

	Remove		Insert	
Section	**Page No**	**Update**	**Page No**	**Update**
PDMS SAR Cover Page	1st page of document	4	1st page of document	5
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Chapter 1	1.4-3/4	4/4	1.4-3/4	4/5
Chapter 3	3.1-23/24	2/2	3.1-23/24	5/2
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Additional Instructions/Comments

These replacement pages are the revised pages associated with Update 5 of the PDMS SAR.

NOTE: Also included in this package are binder sleeves for Update 5.

(Signature) (Ext. No.) (Date)

TMI-2

POST DE-FUELING

MONITORED STORAGE

SAFETY ANALYSIS

REPORT

UPDATE 5
August 2003

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DRAWING REFERENCES

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Turbine Building Basement Plan - East Side	2051
Turbine Building Basement Plan - West Side	2052
Turbine Building Ground Floor Plan - East Side	2053
Turbine Building Ground Floor Plan - West Side	2054
Turbine Building Operating Floor - East Side	2055
Turbine Building Operating Floor - West Side	2056
Turbine Building Section B-B	2057
Turbine Building Sections A-A and C-C	2058
Turbine Building Sections D-D and E-E	2059
P&ID Symbol Identification	2001
Electrical Symbol List	3001
Reactor Building Ventilation and Purge	302-2041
Fire Protection	302-231
Radwaste Disposal Miscellaneous Liquids	302-2045
Radwaste Pumps Seal Water	302-2492
Sump Pump Discharge and Miscellaneous Sumps	302-2496
Building Air Intake, Exhaust, and Radiation Monitoring	302-2219
13.2 KV One Line Diagram	206201
480 Volt Unit Substation	206202
480 Volt Unit Substation	206203
480 Volt Unit Substation	206204
120V Regulated Voltage System	3009

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DC One Line Diagram	3010
480V USS 2-38, 2-48 One Line Diagram	E013
Reactor Building Portable Power Distr. Center	2-E21-011
Reactor Building Portable Power Distr. Center	2-E21-012
Power Distribution Key Diagram	3015
Power Distribution Panel Schedules	3016
Miscellaneous Power Panel Schedules	3017 Sh. 1
Miscellaneous Power Panel Schedules	3017 Sh. 2
Miscellaneous Power Panel Schedules	3017 Sh. 3
Auxiliary Building Heating and Ventilation	302-2042
Fuel Handling Building Heating and Ventilation	302-2343
Instrument Air Supply	302-2012 Sht. 1
Compressed Air Supply	302-2012 Sht. 2

PDMS SAR FIGURES

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Site Topography 5 Mile Radius	2.1-2
Extended Plot Plan	2.1-3
Flood Water Surface Profiles	2.4-1
Details of Effluent Discharge System	2.4-2
Reactor Building - General Layout	3.7-1
Reactor Building Personnel and Equipment Access Openings Detail	3.7-2

3.1.1.67 10 CFR 50.100 - Revocation, Suspension, Modification, of Licenses and Construction Permits for Cause

Article 50.100 provides that the Commission may revoke, suspend, or modify a license or construction permit for any material false statement or for other reasons specified in Article 50.100. No exceptions are taken to the provisions of this article.

3.1.1.68 10 CFR 50.101 - Retaking Possession of Special Nuclear Material

Article 50.101 establishes that the Commission may cause the retaking or possession of special nuclear material upon revocation of a license. No exceptions are taken to the provisions of this article.

3.1.1.69 10 CFR 50.102 - Commission Order for Operation after Revocation

Article 50.102 establishes that the Commission may, by following the requirements of Article 50.102, order operation of a facility whose license has been revoked. No exceptions are taken to the provisions of this article.

3.1.1.70 10 CFR 50.103 - Suspension and Operation in War or National Emergency

Article 50.103 establishes that the Commission has, upon declaration of war by the Congress, certain rights regarding the suspension and/or operation of nuclear power plants licensed by the Commission. No exceptions are taken to the provisions of this article.

3.1.1.71 10 CFR 50.109 - Backfitting

Article 50.109 defines backfitting and defines requirements the Commission must meet regarding backfitting. No exceptions are taken to the provisions of this article.

3.1.1.72 10 CFR 50.110 - Violations

Article 50.110 establishes actions the NRC may take regarding violations of any provision of the Atomic Energy Act of 1954, as amended, or Title II of the Energy Reorganization Act of 1974, or any regulation or order issued thereunder. No exceptions are taken to the provisions of this article.

3.1.1.73 "Article 50.111 - Criminal Penalties"

Article 50.111 defines which articles of 10CFR Part 50 are subject to criminal sanction as defined in the Atomic Energy Act of 1954. No exceptions are taken to the provisions of this article.

3.1.1.74 "Article 50.120 - Training and Qualifications of Nuclear Power Plant Personnel"

As described in TSCR No. 79 Revision 2, TMI-2 complies with the systems approach to training as defined by 10 CFR 50.120 for non-licensed personnel.

3.1.2 GENERAL DESIGN CRITERIA

The Three Mile Island Nuclear Station Unit 2 was designed and constructed in accordance with the 70 general design criteria as listed in Appendix A of 10 CFR 50 dated July 11, 1967. A discussion of each criterion, demonstrating how the principal design features or design bases meet these criteria, is presented in Section 3.1.1 of the TMI-2 FSAR.

The general design criteria in Appendix A were revised by the AEC on July 15, 1971. The design and purchase of many Three Mile Island Unit 2 components were completed prior to the issuance of these revised general design criteria. These revised criteria, as they applied to the original design of the plant, are addressed in Section 3.1.2 of the TMI-2 FSAR.

During the PDMS period, fulfillment of many of the general design criteria in Appendix A of 10 CFR 50 are not necessary or appropriate; departure from the criteria are identified and justified herein. Other of the criteria are applicable only to a very limited degree. Criteria which address such requirements as containment, quality standards, and natural phenomena are examples of hose criteria which apply only to a limited degree during PDMS. Since the plant was originally 3.1-21.UPDATE 2 - AUGUST 1997 designed and constructed in accordance with these criteria and since neither the accident nor activities during the recovery period significantly degraded the plant with respect to the capabilities required during PDMS, the facility, as it exists, is designed and constructed to standards which far exceed the requirements for PDMS. Each of the general design criteria in Appendix A of 10 CFR 50, as revised on January 1, 1987, and the necessary and appropriate degree of applicability during PDMS is discussed in the following sections.

3.1.2.1 Criterion 1 - Quality Standards and Records

Structures, systems, and components important to safety shall be designed, fabricated, erected, and tested to quality standards commensurate with the importance of the safety function to be performed. Where generally recognized codes and standards are used, they shall be identified and evaluated to determine their applicability, adequacy, and sufficiency and shall be supplemented or modified as necessary to assure a quality product in keeping with the required safety function. A quality assurance program shall be established and implemented in order to provide adequate assurance that these structures, systems, and components will satisfactorily perform their safety functions. Appropriate records of the design, fabrication, erection, and testing of structures, systems, and components important to safety shall be maintained by or under the control of the nuclear power unit licensee throughout the life of the unit.

Discussion

Due to the unique condition of TMI-2 during PDMS, the specific requirements of Criterion 1 are not applicable; however, the intent of Criterion 1 has been addressed recognizing that the degree of quality assurance necessary to assure that the required capabilities are maintained during PDMS is far less extensive than that which was originally required for TMI-2. A quality assurance program has been established and will be maintained commensurate with the functional requirements of PDMS. The Quality Assurance Plan for PDMS is referenced in Section 10.1.

3.1.2.2 Criterion 2 - Design Bases for Protection against Natural Phenomena

Structures, systems, and components important to safety shall be designed to withstand the effect of natural phenomena, such as earthquakes, tornadoes, hurricanes, floods, tsunami, and seiches without loss of capability to perform their safety functions. The design bases for these structures, systems, and components shall reflect: (1) Appropriate consideration of the most severe of the natural phenomena that have been historically reported for the site and surrounding area, with

CHAPTER 6

DEACTIVATED SYSTEMS AND FACILITIES

6.0 INTRODUCTION

This chapter describes those systems and facilities which have been deactivated for PDMS. There are two categories of deactivated systems and facilities: 1) deactivated systems and facilities with passive PDMS functions and 2) deactivated systems and facilities.

The first category consists of those systems or facilities which have been deactivated but provide the passive function(s) during PDMS of contamination control and/or containment isolation. No effort will be expended to maintain the design functional capability of these systems and facilities. However, the passive function(s) of the affected systems or facilities will be maintained throughout PDMS to provide reasonable assurance that TMI-2 can be maintained in the PDMS condition with no risk to the health and safety of the public. The passive function of containment isolation will be maintained as required in the PDMS technical specifications section 3.1.1.1, primary containment isolation. The passive function of contamination control will be maintained by adherence to the requirements of the TMI Radiation Protection Program and 1000-PLN-7200.04 (PDMS Quality Assurance Plan).

The second category consists of those systems and facilities which are deactivated because they serve no active or passive function during PDMS. No maintenance is required and no attempts will be made to preserve or maintain these systems and facilities.

Tables 6.1-1, 6.2-1, and 6.3-1 provide a listing of those facilities and systems which will be deactivated during PDMS. These tables also provide other relevant status information for the listed facilities and systems.

Equipment, components, and parts may be removed from systems and facilities designated as deactivated, and used for other purposes, provided their removal does not adversely affect the PDMS function of the system(s) or facilities involved. This may include complete system dismantlement, component removal for use elsewhere, and possible conversion of portions of systems for other uses.

Similarly, equipment, components, and parts may be removed from systems and facilities designated as deactivated with PDMS passive functions provided, the passive function is not compromised or provided, decontamination activities have negated the need for the passive function of contamination control.

A detailed original design description of deactivated facilities and systems may be found in the TMI-2 FSAR and/or system operating description books.

7.2.5.3.3 Evaluation

The communication system will remain in an operational condition during PDMS to provide the following capabilities:

a. Communications throughout Unit 1 and Unit 2.

b. Communication for identification of fire, injury, and flood. Alarms are generated from the TMI-1 Control Room.

c. Communication for evacuation of normally unoccupied areas. Some of the areas identified may be used for storage of equipment and thus require occasional ingress and egress.

7.2.6 PDMS SUPPORT SYSTEMS

The operational systems discussed in this section provide the necessary measures to support PDMS activities. Although they do not directly ensure protective functions, their operation is necessary to carry out anticipated operation, inspection, surveillance, and maintenance activities through PDMS.

7.2.6.1 Auxiliary Building Ventilation System

7.2.6.1.1 PDMS Function

The Auxiliary Building Ventilation System will be maintained in an operational condition to support PDMS activities. When in operation, this system performs the following functions:

a. Provides fresh, filtered, heated air in sufficient quantity to maintain room temperatures compatible for personnel and equipment.

b. Minimizes the spread of contamination by providing air flow from clean areas to potentially contaminated areas and to the exhaust.

c. Filters exhaust air.

The system will also operate to provide freeze protection, as necessary, for liquid systems inside the Auxiliary Building.

7.2.6.1.2 System Description

The Auxiliary Building Ventilation System is a forced-flow heating and ventilating system consisting of supply and exhaust subsystems, with exhaust HEPA filter train[3], which provides

[3]A local differential pressure indicator is installed across each HEPA filter. These indicators are routinely checked on a monthly surveillance when the ventilation system is in service. During PDMS, the ventilation system may be out of service for extended periods of time. No checks will be performed on the HEPA filters when the ventilation system is shutdown. The surveillance of the HEPA filters will be resumed when the system is returned to service.

once-through ventilation with no recirculation. The discharge dampers of the supply and exhaust fans are closed when the ventilation system is not operating. The PDMS configuration is shown on GPUN Drawing 302-2042.

7.2.6.1.3 Evaluation

During PDMS, Auxiliary Building ventilation and air handling equipment provide a filtered pathway during system operation to meet industrial and radiological requirements. Sources of contamination have been minimized (e.g., fuel removed, fuel pool drained, layup of deactivated systems); therefore, spread of potential contamination during PDMS has been greatly reduced.

7.2.6.2 Fuel Handling Building Ventilation System

7.2.6.2.1 PDMS Function

Fuel Handling Building Ventilation System will be maintained in an operational condition to support PDMS activities. When in operation, this system performs the following functions:

a. Provides fresh, filtered, heated air in sufficient quantity to maintain room temperatures suitable for personnel and equipment.

b. Minimizes the spread of contamination by providing air flow from clean areas to potentially contaminated areas, and then to the exhaust.

c. Filters exhaust air.

d. Maintains the lower elevations (328', 305', and 281') of the Fuel Handling Building separate from the operating deck, which is maintained at a slightly negative pressure by the Unit 1 ventilation system.

The system will also operate to provide freeze protection, as necessary, for liquid systems inside the Fuel Handling Building.

7.2.6.2.2 System Description

The Fuel Handling Building Ventilation System is a forced flow heating and ventilating system consisting of supply and exhaust subsystems, with exhaust HEPA filter train[3], which provide once-through ventilation with no recirculation. The operating deck and Fuel Handling Building truck bay are separated from the remainder of the Fuel Handling Building and are ventilated by the Unit 1 ventilation system. The PDMS configuration is shown on GPUN Drawing 302-2343.

7.2.6.2.3 Evaluation

During PDMS, FHB ventilation and air handling equipment provide a filtered pathway during system operation to meet industrial and radiological requirements. Sources of contamination have been minimized (e.g., fuel removed, fuel pool drained, layup of deactivated systems, covers installed on spent fuel pools); therefore, spread of potential contamination during PDMS has been

greatly reduced.

7.2.6.3 Air Intake Tunnel Ventilation System

The Air Intake Tunnel will be maintained only as a supply pathway for screened air to plant ventilating systems during operation. It consists of a cylindrical intake tower with screens and baffles, a 100,000 gallon sump, and an underground tunnel leading to the plant ventilation systems. The PDMS configuration is shown on GPUN Drawing 302-2219.

During PDMS, the Air Intake Tunnel provides a supply pathway for ventilation systems operation to meet industrial and radiological requirements.

7.2.6.4 Compressed Air Supply System

7.2.6.4.1 PDMS Function

Portions of the original plant Instrument and Service Air Systems will be utilized during PDMS to provide compressed air to operational pneumatic devices in the following systems:

a. Waste Disposal - Liquid

b. Auxiliary Building Ventilation System

c. Fuel Handling Building Ventilation System

d. Control Building Ventilation System

e. Service Building Ventilation System

f. RB Purge System

g. RB Breather System

7.2.6.4.2 System Description

The Compressed Air Supply System consists of two air-cooled air compressors, air dryer, receivers, and the piping and valves required to distribute compressed air to operational pneumatic devices. The major components, piping, and valves of the original plant Instrument/Service Air Systems have been incorporated as part of the Compressed Air Supply System. Two

air-cooled air compressors **and associated air dryer** are used to supply air to the modified systems in place of the original water-cooled compressors. The Compressed Air System will be operated continuously to support operations.

7.2.6.4.3 Evaluation

The Compressed Air Supply System primarily utilizes the portions of the original plant Instrument/Service Air System, which are required to store and distribute air to pneumatic devices supporting PDMS. Since cooling water will not be available during PDMS to cool air compressors, air-cooled air compressors have been used.

7.2.6.5 Building Inleakage Waterproofing System

7.2.6.5.1 PDMS Function

During PDMS, the TMI-2 building waterproofing systems serve to direct roof rainwater into the site stormwater drainage system and prevent groundwater from entering buildings through joints, penetrations, and cracks.

7.2.6.5.2 System Description

The plant waterproofing systems consist of:

a. Building roofing systems

b. Basement waterproofing from groundwater.

c. A cork seam monitoring system (see Section 1.1.2.2.4).

The building roofs, except for the Auxiliary and Reactor Buildings, are a built-up system of asphalt, felts, and insulation on both concrete and steel decks. Rainwater is directed via roof slope to roof drains which carry the rainwater to the site stormwater drainage piping. All runoff is collected in a retention basin which can be monitored prior to discharge into the Susquehanna River.

All basement walls are poured concrete. To prevent groundwater inleakage, the following were performed:

a. All penetrations through basement walls were sealed.

b. Expansion joints between building foundations were sealed with waterstops, cork filler, and epoxy sealant.

c. Construction joints were keyed to deter water seepage through them.

7.2.6.5.3 Evaluation

In preparation for PDMS, various building seams, link seals, and major cracks have been repaired to the extent practical to minimize expected inleakage from storms and high groundwater levels. The inleakage rates and flowpaths experienced to date do not affect plant equipment required for PDMS. Additionally, the Sump Pump Discharge and WDL system are operational to transfer accumulated water to minimize potential spread of contamination due to localized flooding.

7.2.6.6 Sewers

7.2.6.6.1 PDMS Function

The basic function of the sewage collection system is to transport sewage from TMI-2 structures to the Sewage Treatment Plant. The PDMS configuration is shown on GPUN Drawing 302-151.

7.2.6.6.2 System Description

Sewage from the temporary personnel access facility (TPAF) in the Turbine Building is routed to the Sewage Treatment Plant (STP) which serves both TMI-1 and TMI-2. The major operational portion of the Sewer System is underground gravity flow piping that provides for the transport of sewage from the Unit 2 support facilities to the STP.

7.2.6.6.3 Evaluation

The Sewage Treatment Plant will process sewage from the TPAF. The majority of TMI-2 sewage piping is underground below the frost line. The original plant sanitary waste/sewage system is deactivated.

7.2.6.7 Domestic Water System

7.2.6.7.1 PDMS Function

During PDMS, portions of the existing domestic water system will remain operational to provide domestic water services required during PDMS.

7.2.6.7.2 System Description

The domestic water system is maintained as a modified operational system. Unit 2 is supplied with domestic water from Unit 1 which is then distributed to Unit 2 support facilities. Domestic water is provided to the radwaste seal water unit in the Auxiliary Building, to the TPAF in the Turbine Building, and to several outbuildings. The PDMS configuration is shown on GPUN Drawings 302-158 Sht. 4.

7.2.6.7.3 Evaluation

Since personnel access into the plant will be infrequent, only one source of domestic water is required in the Turbine Building. The Auxiliary Building header supplies domestic water to the seal water unit. Unit 1 and Unit 2 support facilities will remain operational; therefore, domestic water will continue to be supplied.

7.2.6.8 Control Room Ventilation System

7.2.6.8.1 PDMS Function

The Control Room Ventilation System will be maintained in an operational condition to support PDMS activities. This system provides fresh, filtered, heated or cooled air in sufficient quantity to support personnel occupancy and equipment protection.

7.2.6.8.2 System Description

The Control Room Ventilation System consists of one supply fan (AH-C-16B) running in a forced ventilation mode during normal year round conditions. The supply fan will primarily recirculate the control room air as it is heated/cooled. A small amount of fresh air (outside air) will be force supplied by bypass booster fan (AH-C-16X). Exhaust fan (AH-E-35) will return control room air to the suction of supply fan (AH-C-16B). A small amount of the control room air will be "exhausted" out of this recirc mode, primarily by exfiltration dampers in the control room and via the kitchen and toilet fans. This provides for a small amount of air change per day.

Control Room air temperature is monitored by a sensing bulb located in the Control Room return air duct. The sensing bulb provides signals to a local temperature controller **which controls heating or cooling as conditions dictate. Two steps of heating are available for freeze protection and two stages of cooling are available from the** 10 ton **air conditioner** which also reduces Control Room humidity.

Neither cooling or heating functions will operate unless supply fan (AH-C-16B) is running and satisfying a flow switch in the supply air duct.

Additional outside air can be provided by performing special operations if the chiller malfunctions and/or additional cool outside air is desired.

7.2.6.8.3 Evaluation

During PDMS, Control Room ventilation and air handling equipment provides a filtered pathway for active operation to meet industrial and radiological requirements. The Control Room Ventilation System is maintained operational for the maintenance and surveillance entries into the TMI-2 Control Room and in response to off-normal conditions.

CHAPTER 10
ADMINISTRATIVE FUNCTIONS
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10.4 RADIATION PROTECTION PROGRAM

TMI-1 maintains a Radiation Protection **Program** which meets or exceeds standards for protection against exposures to radiation and radioactivity at the TMI site. There exists only one Radiation Protection **Program** for the TMI station. The **Program** encompasses both TMI-1 and TMI-2 and is under the authority of AmerGen, the TMI-1 License holder. The implementation of the Radiation Protection **Program** ensures that the facility will be managed and maintained during PDMS in a manner which minimizes risks to employees, contractors, visitors, and the public from exposure to radiation and radioactivity at the facility. The implementation of the **program** also ensures a radiologically safe working environment for employees and visitors at TMI-2.

10.5 ORGANIZATION

The organizational elements responsible for the PDMS phase of TMI-2 are shown on Figure 10.5-1. The specific responsibilities are discussed below. Additionally, the PDMS Technical Specifications prescribe specific requirements for staff qualifications, training, and the review and audit of TMI-2 activities.

As part of the sale of TMI-1, GPU Nuclear entered into an agreement with AmerGen for TMI-2 services. Under this agreement and as a contractor subject to GPU Nuclear's ultimate direction and control, AmerGen will provide all services, materials and equipment required to maintain TMI-2 in Post-Defueling Monitored Storage (PDMS). Services provided by AmerGen will meet all the requirements of the Safety Analysis Report, Technical Specifications and Quality Assurance Program. Services include:

- **Management services;**
- **Operations, maintenance and testing;**
- **Radwaste operations;**
- **Quality Assurance;**
- **Radiation controls and health physics;**
- **Environmental controls;**
- **Security;**
- **Safety;**
- **Administrative services, including logistical support, information technology support and procurement services;**
- **Engineering and Licensing;**
- **Warehousing and housekeeping;**
- **Support services required in connection with the performance of routine corrective and preventative maintenance;**
- **Interface with the NRC as necessary in connection with inspections, audits, site visits or meetings;**
- **Maintain required NRC licensing documents for TMI-2; and**
- **Prepare regulatory correspondence for GPU Nuclear signature or file on behalf of GPU Nuclear, to the extent permitted under applicable NRC regulations, all documents required in connection with PDMS of TMI-2.**

Figure 10.5-1 also shows the AmerGen organization which will provide the above services.

10.5.1. GPU Nuclear Cognizant Officer

The GPU Nuclear Cognizant Officer has the overall responsibility for the management of TMI-2 during PDMS.

10.5..2 GPU Nuclear Ombudsman

An Ombudsman is provided by GPU Nuclear as part of the company's employee concern program. The Ombudsman reports to the **Vice President GPU Nuclear Oversight**, and if necessary has access to the GPU Nuclear Board of Directors.

This individual is accessible on a confidential basis, if desired, to anyone in the company or its contracted employees having a nuclear or radiation safety concern he or she considers is not being adequately addressed. The Ombudsman is empowered to investigate such matters, identify any needed action and seek its resolution. The Ombudsman will reply to the individual who raised the matter.

10.5..3 TMI-2/SNEC Oversight Committee

Independent oversight is provided by the TMI-2/SNEC Oversight Committee which serves to independently assure that the TMI-2 structures, systems and components are maintained so as to protect the health and safety of the workers, the public and the environment and to enable effective and efficient dismantlement and decommissioning in the future. The committee is **sponsored by the Vice President GPU Nuclear Oversight.**

10.5..4 Manager, PDMS

The Manager, PDMS has the first-level management responsibility for maintaining the TMI-2 PDMS condition. The Manager, PDMS is directly responsible for the operations and maintenance activities associated with the TMI-2 PDMS.

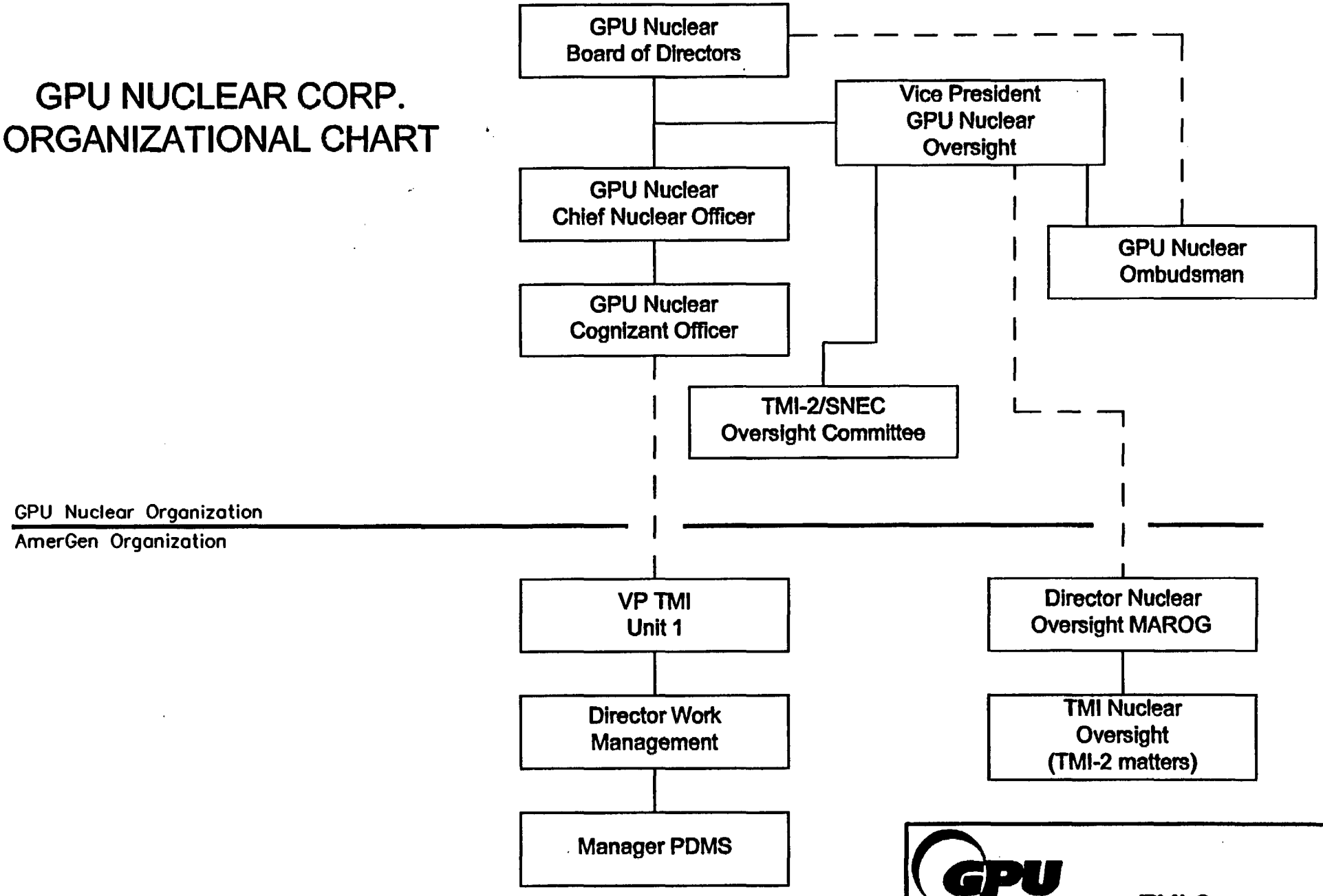
10.5.5 Organizational Commitments

TMI-2 License Amendment and Technical Specification Change Request No. 78, submitted to the NRC on April 6, 2000, requested organizational and administrative changes that will exist following the sale of the Oyster Creek Nuclear Generating Station to AmerGen. Attachment 3 to that submittal listed a number of commitments for TMI-2 and a general commitment to list the commitments in the PDMS SAR. The listing, as issued in TMI-2 Technical Specification Amendment No. 54, is as follows:

1. The GPU Nuclear Cognizant Officer will have overall responsibility for TMI-2. A description of responsibilities and qualifications for this position will be addressed in the PDMS Quality Assurance (QA) Plan.

2. A GPU Nuclear employee or third party contractor will be permanently assigned at the TMI site.

GPU NUCLEAR CORP. ORGANIZATIONAL CHART



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GPU NUCLEAR TMI-2

GPU NUCLEAR CORP. ORGANIZATIONAL CHART

TMI-2

POST DE-FUELING

MONITORED STORAGE

SAFETY ANALYSIS

REPORT

UPDATE 5
AUGUST 2003

TMI-2 POST DEFUELING MONITORED STORAGE SAFETY ANALYSIS REPORT

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