

June 25, 1987

Mr. F. R. Standerfer
Vice President/Director
Three Mile Island, Unit 2
GPU Nuclear Corporation
P. O. Box 480
Middletown, Pennsylvania 17057

Dear Mr. Standerfer:

SUBJECT: ISSUANCE OF AMENDMENT NO. 28 TO FACILITY OPERATING LICENSE NO.
DPR-73 FOR THREE MILE ISLAND NUCLEAR STATION, UNIT 2

The Commission has issued the enclosed Amendment No. 28 to Facility Operating Licensing No. DPR-73 for the Three Mile Island Nuclear Station, Unit 2. The Amendment consists of changes to the Appendix A Technical Specifications in response to your application transmitted by letter dated January 27, 1987 (Technical Specification Change Request No. 55).

The amendment revises Sections 6.8.2.2, 3.1.1.2, 3.4.1, 3.4.9.2, 3.8.2.1, 3.9.2, 3.9.4, 3.4.4-1 and Table 6.2-1 of the Appendix A Technical Specifications. The amendment redefines the scope of licensee procedures and changes thereto that require NRC staff approval prior to implementation. This amendment modifies the Technical Specification to require NPC staff approval of only those procedures and changes thereto which alter the distribution or processing of a quantity of radioactive material, the release of which could cause the magnitude of radiological releases to exceed the design objectives of 10 CFR 50 Appendix I.

A copy of the revised pages for the Technical Specifications and the Safety Evaluation supporting the amendment are enclosed.

Sincerely,

Michael J. Masnik for
William D. Travers, Director
TMI-2 Cleanup Project Directorate
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 28 to DPR-73
2. Safety Evaluation

cc w/enclosures:
See next page

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GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

DOCKET NO. 50-320

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 28
License No. DPR-73

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The applications for amendment dated January 27, 1987 by General Public Utilities Nuclear Corporation (licensee), comply with standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter 1;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public;
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-73 is hereby amended to read as follows:

2.C (2) Technical Specifications

The Technical Specifications contained in Appendices A and B, as revised through Amendment No. 28 are hereby incorporated in the license. The licensee shall operate the facility in

accordance with Technical Specifications and all Commission Orders issued subsequent to March 28, 1979.

3. This license amendment is effective as of the date of its issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Michael J. Masnick for

William D. Travers, Director
TMI-2 Cleanup Project Directorate
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Date of Issuance: June 25, 1987

ATTACHMENT TO LICENSE AMENDMENT NO. 28
TO FACILITY OPERATING LICENSE NO. DPR-73
DOCKET NO. 50-320

Replace the following pages of the Appendix A Technical Specifications with the enclosed pages. The revised pages are identified by amendment number and contain a vertical line indicating the area of change.

Amendment Page

3.1-2

3.4-1

3.8-4

3.9-1

3.9-2

B 3/4 4-1

6-2

6-11

LIMITING CONDITIONS FOR OPERATION

BORON CONCENTRATION

3.1.1.2 The boron concentration of the coolant in all filled portions of the Reactor Coolant System shall be maintained between 4350 and 6000 ppm and at a temperature above 50°F.

APPLICABILITY: RECOVERY MODE

ACTION:

If either of the above conditions are not satisfied (Boron Concentration between 4350 and 6000 ppm and temperature above 50°F), immediately suspend all activities involving CORE ALTERATION or the Reactor Coolant System and take action in accordance with Specification 3.0.3 to restore the concentration to within acceptable limits. |

3.1.1.3 The boron concentration of the water in all filled portions of the Fuel Transfer Canal (deep end) and the Spent Fuel Storage Pool "A" shall be maintained between 4350 and 6000 ppm.

APPLICABILITY: RECOVERY MODE

ACTION

If the above condition is not satisfied (Boron Concentration between 4350 and 6000 ppm), take action necessary to restore the boron concentration to within acceptable limits.

3.1.3 CONTROL ASSEMBLIES

MECHANISMS

3.1.3.1 deleted.

LIMITING CONDITIONS FOR OPERATION

3.4 REACTOR COOLANT SYSTEM

REACTOR COOLANT LOOPS

3.4.1 Deleted

REACTOR VESSEL WATER LEVEL MONITORING

3.4.2 As a minimum two independent reactor vessel level monitoring instruments shall be OPERABLE.

APPLICABILITY: RECOVERY MODE WITH THE RV HEAD REMOVED

ACTION

- a. With only one reactor vessel level monitoring instrument OPERABLE, terminate all activities involving changes in the reactor coolant system water volume, restore the system to OPERABLE status within 72 hours.
- b. With no reactor vessel level monitoring instrument OPERABLE, terminate all activities involving changes in the reactor coolant system water volume. Restore the system to OPERABLE status within 24 hours.

SAFETY VALVES

3.4.3 Deleted.

3.4.9 PRESSURE/TEMPERATURE LIMITS

REACTOR COOLANT SYSTEM

3.4.9.1 The Reactor Coolant System shall be maintained between a T_{avg} of less than 200°F and greater than 50°F.

3.4.9.2 The Reactor Coolant System shall remain open to the reactor building atmosphere unless repressurization is approved in a safety evaluation submitted to the NRC. This safety evaluation shall specify the maximum pressure limits and overpressure protection that is required.

LIMITING CONDITIONS FOR OPERATION

3.8.2 ONSITE POWER DISTRIBUTION SYSTEMS

3.8.2.1 A.C. DISTRIBUTION

3.8.2.1.a The A.C. electrical busses listed in Section 4.8.2.1.a of the RECOVERY OPERATIONS PLAN shall be OPERABLE and energized with tie breakers open (unless closed in accordance with site approved procedures) between redundant busses.

APPLICABILITY: RECOVERY MODE.

ACTION:

With less than the above complement of A.C. busses OPERABLE, restore the inoperable bus to OPERABLE status within 8 hours.

3.8.2.1.b The AC electrical busses listed in Section 4.8.2.1.b of the RECOVERY OPERATIONS PLAN shall be OPERABLE and energized.

APPLICABILITY: RECOVERY MODE

ACTION:

- a. With any of the above A.C. busses incapable of being supplied by its respective inverter, restore that capability to the affected bus within 7 days.
- b. With any of the above A.C. busses de-energized, restore the inoperable bus to OPERABLE status within 8 hours.

LIMITING CONDITIONS FOR OPERATION

3.9 RADIOACTIVE WASTE STORAGE

SPENT FUEL STORAGE POOL "A" WATER LEVEL MONITORING

3.9.1 Two independent Spent Fuel Storage Pool "A" water level monitoring instruments shall be OPERABLE.

APPLICABILITY: Whenever any Canister containing core material is in the Spent Fuel Storage Pool "A".

ACTION:

- a. With only one Spent Fuel Storage Pool "A" water level monitoring instrument OPERABLE, immediately verify that the water level is within limits, re-verify the level at least once per 24 hours and restore a second instrument to OPERABLE status within 7 days.
- b. With no Spent Fuel Storage Pool "A" water level monitoring instruments OPERABLE, terminate all activities involving any Canister containing core material in or over Spent Fuel Storage Pool "A" and all operations involving changes in Spent Fuel Storage Pool "A" water inventory and restore at least one instrument to OPERABLE status within 24 hours.

SPENT FUEL STORAGE POOL "A" WATER LEVEL

3.9.2 The water level in Spent Fuel Storage Pool "A" shall be maintained as specified in Section 4.9.2 of the Recovery Operations Plan.

APPLICABILITY: Whenever any Canister containing core material is in the Spent Fuel Storage Pool "A".

ACTION:

With Spent Fuel Storage Pool "A" water level not within the specified band, terminate all activities involving any Canister containing core material in or over Spent Fuel Storage Pool "A" and restore the water level to within specification within 24 hours.

FUEL TRANSFER CANAL (DEEP END) WATER LEVEL MONITORING

3.9.3 Two independent Fuel Transfer Canal (deep end) water level monitoring instruments shall be OPERABLE.

APPLICABILITY: Whenever any Canister containing core material and/or the plenum assembly is in the Fuel Transfer Canal (deep end).

ACTION:

- a. With only one Fuel Transfer Canal (deep end) water level monitoring instrument OPERABLE, immediately verify that the water level is within limits, re-verify the level at least once per 24 hours and restore a second instrument to OPERABLE status within 7 days.

LIMITING CONDITIONS FOR OPERATION

- b. With no Fuel Transfer Canal (deep end) water level instruments OPERABLE, terminate all activities involving any Canister containing core material in or over the Fuel Transfer Canal (deep end) and/or all activities involving the plenum assembly and all operations involving changes in the Fuel Transfer Canal (deep end) water inventory and restore one inoperable instrument to OPERABLE status within 24 hours.

FUEL TRANSFER CANAL (DEEP END) WATER LEVEL

3.9.4 The water level in the Fuel Transfer Canal (deep end) shall be maintained at the level specified in Section 4.9.4 of the Recovery Operations Plan.

APPLICABILITY: Whenever any Canister containing core material and/or the plenum assembly is in the Fuel Transfer Canal (deep end).

ACTION:

- a. With the Fuel Transfer Canal (deep end) water level not within the specified band, terminate all activities involving any Canister containing core material in or over the Fuel Transfer Canal (deep end) and/or all activities involving the plenum assembly and restore the water level to within specification within 24 hours.

FUEL HANDLING BUILDING/AUXILIARY BUILDING AIR CLEANUP SYSTEMS

3.9.12.1 The Fuel Handling Building Air Cleanup Exhaust System shall be OPERABLE with one of the four system air cleanup exhaust fans OPERABLE.

APPLICABILITY: RECOVERY MODE

ACTION:

With the Fuel Handling Building Air Cleanup Exhaust System inoperable, restore the system to OPERABLE status within 4 hours or, suspend all operations involving movement of liquid and gaseous radioactive wastes in the Fuel Handling Building (other than sampling evolutions required by the Technical Specifications or RECOVERY OPERATIONS PLAN) until the system is restored to OPERABLE status.

3/4.4 REACTOR COOLANT SYSTEM

BASES

3/4.4.1 REACTOR COOLANT LOOPS

Deleted.

3/4.4.2 REACTOR VESSEL LEVEL MONITORING

The Reactor Vessel Water Level Monitor ensures that indication is available to monitor for changes in reactor vessel water level. This device will provide warning of a leak from the Reactor Coolant System or unexplained increases in Reactor Coolant System inventory which could result in a boron dilution event. Two independent monitors are required to provide redundancy and to minimize the necessity to discontinue processing because of instrument failures.

3/4.4.3 SAFETY VALVES

Deleted.

3/4.4.9 PRESSURE/TEMPERATURE LIMIT

The Reactor Coolant System pressure and temperature will be controlled in accordance with approved procedures to prevent a nonductile failure of the Reactor Coolant System while at the same time preventing precipitation of the boron used to maintain subcriticality.

During the RECOVERY MODE, the Reactor Coolant System boundary will be modified periodically to meet recovery objectives. Whenever the Reactor Coolant System is not vented (open to the atmosphere), overpressure protection will be provided to ensure that the allowable RCS pressure is not exceeded.

Reactor coolant chemistry surveillance requirements are included in the RECOVERY OPERATIONS PLAN. These requirements provide assurance that localized corrosion or pitting in crevice areas, which could tend to promote stress corrosion cracking in heat affected zones of welds in stainless steel piping or components, will not occur.

ADMINISTRATIVE CONTROLS

Table 6.2-1

MINIMUM SHIFT CREW COMPOSITION#

LICENSE CATEGORY	RECOVERY MODE
SOL	1*
OL	1
Non-Licensed	2

#Shift crew composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1.

*During CORE ALTERATIONS an additional SOL or an SOL limited to fuel handling will be stationed on the operating floor, in the command center, or in the control room to directly control the particular CORE ALTERATION activity being performed.

ADMINISTRATIVE CONTROLS

6.8.2.1 Each procedure and any change to any procedure prepared pursuant to 6.8.1, shall be prepared, reviewed and approved in accordance with 6.5 and will be reviewed periodically as required by ANSI 18.7 - 1976.

6.8.2.2 Procedures of 6.8.1.a and changes thereto which alter the distribution or processing of a quantity of radioactive material, the release of which could cause the magnitude of radiological releases to exceed 10 CFR 50 Appendix I design objectives, shall be subject to approval by the NRC prior to implementation.

6.8.3.1 Temporary changes to procedures of 6.8.1 may be made provided that:

- a. The intent of the original procedure control is not altered, and
- b. (1) For those procedures which affect the operational status of unit systems or equipment, the change is approved by two members of the unit management staff, at least one of whom holds a Senior Reactor Operator's License. If one of the two above signatures is not by a supervisory person within the Department having cognizance of the procedure being changed, the signature of that supervisory person within the department will also be required, or

(2) For those procedures which do not affect the operational status of unit systems or equipment, the change is approved by two members of the responsible organization. If one of the two above signatures is not by a section manager/director within the Department having cognizance of the procedure being changed, the signature of that section manager/director within the department will also be required, and
- c. The change is documented, Independent Safety Review completed, and the required reviews and approvals are obtained within 14 days, and
- d. Those changes to procedures described by 6.8.2.2 are submitted to the NRC for review within 72 hours following approval by the management level specified for implementation by Section 6.5.1.9.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted to the NRC Region I Administrator unless otherwise noted.

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

GPU NUCLEAR CORPORATION

METROPOLITAN EDISON COMPANY

PENNSYLVANIA ELECTRIC COMPANY

JERSEY CENTRAL POWER & LIGHT COMPANY

DOCKET NO. 50-320

THREE MILE ISLAND NUCLEAR STATION UNIT NO. 2

1.0 INTRODUCTION

By letter dated January 27, 1987, GPU Nuclear Corporation (GPUNC) requested the approval of changes to the Technical Specifications of Operating License No. DPR-73 and provided supporting information for the proposed modifications. Also included was a request to modify the Recovery Operations Plan which will be addressed in separate correspondence. The proposed changes to the Technical Specifications redefine the scope of licensee procedures requiring NRC staff review and approval prior to implementation. The proposed changes would modify the Administrative Controls section defining the scope of procedures requiring NRC approval, and the related Limiting Conditions for Operations that make reference to the Administrative Controls section.

2.0 DISCUSSION AND EVALUATION

Section 6.8

Technical Specification 6.8.2 requires that the licensee obtain NRC staff approval of detailed operating procedures and changes to procedures that:

1) directly relate to core cooling, 2) could cause the magnitude of radiological releases to exceed NRC limits, 3) could increase the likelihood of failures in systems important to nuclear safety and radioactive waste processing or storage, or 4) alter the distribution or processing of significant quantities of radioactivity being stored or released through known flow paths.

The licensee proposes to modify the Technical Specifications to require NRC staff approval of only those procedures and changes thereto which alter the distribution or processing of a quantity of radioactive material, the release of which could cause the magnitude of radiological releases to exceed the design objectives of 10 CFR 50 Appendix I.

The March 28, 1979 accident left Three Mile Island Unit 2 incapable of normal operations. Although the reactor was shutdown shortly after the accident, a great deal of uncertainty remained regarding the condition of plant systems, the extent of nuclear fuel damage, and the best approach for recovery from the accident. As a result of the accident the facility was severely contaminated and there was the presence of highly contaminated liquids in the reactor building basement and in tanks in the auxiliary building. The potential impact on public health and safety arising from the unique and relatively unknown conditions of the facility resulted in an agency decision to include NRC staff review and approval in the control of certain plant activities. As a result, the requirements of the Technical Specification 6.8.2 were imposed upon the licensee and formally incorporated by the Commission Order of February 11, 1980 issuing the proposed Technical Specifications to license DPR-73.

This license requirement for detailed NRC review and approval of many operating procedures has been unique to the TMI-2 project. The adequacy of licensee procedures at nuclear power facilities is normally only monitored by the NRC on a periodic audit basis.

Cleanup activities have been ongoing for about eight years and the facility is currently in a stable, long-term shutdown mode. Fission product decay has progressed to the point that the decay heat load is less than 10 kilowatts and forced cooling of the reactor core is no longer needed. The reactor coolant system is no longer pressurized and the reactor vessel head has been removed from the vessel. The core is covered with water and is maintained subcritical by the presence of boron in the water. Analyses have shown that there is no credible configuration of the core material that could result in a recriticality as long as the boron concentration in the water is maintained within the current Technical Specification limits. Removal of the damaged core is in progress and about 30 percent of the core debris has been removed from the reactor vessel. The plant is no longer in a potentially unstable dynamic situation with the need for immediately available safe shutdown systems to cope with emergencies. Based on the current status of the TMI-2 facility requirements for operability of emergency diesel generators were deleted in an earlier licensing action. Additionally, a great deal of decontamination work has been completed in the reactor building and in the auxiliary and fuel handling buildings. Highly contaminated water resulting from the accident has been processed to remove a large quantity of the radioactive material and much of the resulting waste has been removed from the site for proper disposal.

Major defueling related activities are reviewed by the NRC staff and the potential consequences of postulated accidents related to those activities are evaluated by the staff to assure that those activities do not pose a risk to the public health and safety. These reviews are documented in docketed safety evaluation reports.

Since the accident, the licensee has implemented a number of major management and organizational changes designed to more effectively manage the unique challenge of the post-accident cleanup. These changes have resulted in an organizational structure which places an acceptable emphasis on the safe conduct of cleanup activities with adequate provisions for management review and oversight of facility activities. The staff's ongoing assessment of the licensee's procedure development and review program indicates that it is working effectively to assure implementation of the Technical Specifications and compliance with regulatory requirements.

Based on the above, the staff concludes that the cleanup activities at the Three Mile Island Unit 2 facility no longer require unique administrative controls for all significant station activities. Recognizing the current plant conditions it is appropriate to effectively focus NRC attention in the area of procedural controls on only those activities with potential offsite consequences. Thus, the staff concludes that reducing the scope of licensee procedures requiring pre-implementation NRC approval to include only those which involve a quantity of radioactive material the release of which could cause the magnitude of radiological release to exceed the design objectives of 10 CFR 50

Appendix I will not pose additional risk to the public health and safety. The staff therefore concurs with the requested change.

The staff will continue to review the adequacy of all licensee procedures and the licensee's compliance with regulatory requirements through the routine NRC inspection program. This includes onsite inspection of licensee activities, and periodic technical review and evaluation of licensee procedures.

Section 3.1.1.2

Technical Specification 3.1.1.2 requires that action be taken in accordance with procedures approved pursuant to Technical Specification 6.8.2 if reactor coolant system boron concentration or temperatures are outside of specified limits.

The licensee proposes to modify the specification by eliminating the reference to Technical Specification 6.8.2 and by requiring corrective action in accordance with the currently existing Technical Specification 3.0.3.

The staff has concluded that since the corrective action and reporting requirements of Technical Specification 3.0.3 are already applicable even with the use of NRC approved procedures, the modifications do not allow a reduction in the actions required to maintain safe stable conditions and are in accord with the reduction in the scope of procedures requiring NRC

scope of procedures requiring NRC approval as previously discussed. Implementing procedures will still be required per existing codes and standards imposed by other regulatory requirements. The staff therefore concurs with the requested changes.

Sections 3.9.2 and 3.9.4

These specifications require maintaining the Spent Fuel Pool "A" and Fuel Transfer Canal water levels in accordance with NRC approved procedures.

The proposed modification would eliminate the requirement for NRC approval of the applicable procedures. However, it would impose the current quantitative water level limits contained in the presently approved procedures by reference to the Recovery Operations Plan. Changes to the Recovery Operations Plan require NRC review and approval.

The staff has determined that the modification would not result in any less conservative limits than are presently in place and approved by the staff and therefore concurs with the requested change.

3.0 CONTACT WITH STATE OFFICIAL

The NRC staff has contacted, by telephone, the Director, Bureau of Radiation Protection, Department of Environmental Resources, Commonwealth of Pennsylvania, concerning the proposed determination of no significant hazards consideration. No objection to the proposed action was voiced.

staff approval as discussed previously. The staff therefore concurs with the requested change.

Sections 3.4.1 and 3/4.4.1

These specifications only require that the reactor coolant system be operated in accordance with NRC approved procedures, and state that the basis for these specifications is to ensure adequate core cooling.

The licensee proposes to delete these specifications.

Deletion of these specifications will not alter the limits of reactor coolant system parameters imposed by other existing Technical Specifications. It will only delete the requirement for NRC approval of Technical Specification implementing procedures. Therefore, for the reasons stated previously, there is no longer a need for NRC staff approval of procedures that may affect core cooling. The staff therefore concurs with the requested changes.

Sections 3.4.9.2, 3.8.2.1, and Table 6.2-1

These specifications contain a reference to specification 6.8.2. The licensee proposes to delete the references to the procedure review requirements of specification 6.8.2.

The proposed modifications do not result in any change to the requirements imposed on the licensee other than the reductions in the

4.0 ENVIRONMENTAL CONSIDERATION

We have determined that the amendment does not authorize a change in effluent types or total amounts and will not result in a significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration (52FR16947), and no public comments or requests for a hearing were received. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONCLUSION

Based upon our evaluation of the proposed changes to the TMI-2 Technical Specifications the staff finds that the licensee's request is acceptable.

We have further concluded, based on the considerations discussed above, that:

- (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and

- (2) such activities will be conducted in compliance with the Commission's regulations and the implementation of this change will not be inimical to the common defense and security or to the health and safety of the public.