

February 21, 1990

Docket No. 50-320

Mr. Michael B. Roche
Vice President/Director
Three Mile Island Unit 2
GPU Nuclear Corporation
P. O. Box 480
Middletown, Pennsylvania 17057

Dear Mr. Roche:

SUBJECT: THREE MILE ISLAND NUCLEAR STATION UNIT NO. 2 - ISSUANCE OF AMENDMENT
(TAC NO. 71788)

The Commission has issued the enclosed Amendment No. 37 to Facility Operating License No. DPR-73 for the Three Mile Island Nuclear Station, Unit No. 2, in response to your letter dated December 27, 1988 (Technical Specification changes Request No. 62).

The amendment modified Appendix A Technical Specifications relating to unit staff qualifications once the facility enters Mode 2.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

/s/

Michael T. Masnik, Senior Project Manager
Project Directorate 1-4
Division of Reactor Projects - 1/11
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 37 to DPR-73
2. Safety Evaluation

cc w/enclosures:
See next page

IFC :LA:PDI-4	PM:PDI-4	PD:PDI-4	OGC		
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DATE : 1/23/89	1/24/89	1/24/89	1/29/89		

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DATED: February 21, 1990 .

AMENDMENT NO. 37 TO FACILITY OPERATING LICENSE NO. DPR-73

Docket File

NRC & Local PDR

Plant File

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Mr. M. B. Roche
GPU Nuclear Corporation

Three Mile Island Nuclear Station
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

GPU NUCLEAR CORPORATION

DOCKET NO. 50-320

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 37
License No. DPR-73

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by GPU Nuclear Corporation, (the licensee) dated December 27, 1988, as supplemented July 13, 1989 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;
 - B. The facility will operate in conformity with the application, 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 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; and
 - 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) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 37, are hereby incorporated in the license. GPU Nuclear Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance, to be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

Attachment:
Charges to the Technical
Specifications

Date of Issuance: February 21, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 37

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

Remove

6-3

6-11

Insert

6-3

6-11

ADMINISTRATIVE CONTROLS

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI-N 18.1 of 1971 for comparable positions unless otherwise noted in the Technical Specifications. During Modes 2 and 3, the requirements of ANSI N18.1-1971, that pertain to unit staff operator license qualifications shall not apply.

6.3.2 The Manager, Radiological Controls TMI-2 shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975. Each Radiological Controls Technician in responsible positions/Foreman shall meet or exceed the qualifications of ANSI 18.1-1971, paragraph 4.5.2/4.3.2, or be formally qualified through an NRC approved TMI-2 Radiation Controls training program. Individuals who do not meet ANSI 18.1-1971 Section 4.5.2 are not considered technicians for purposes of determining qualifications but are permitted to perform work for which qualification has been demonstrated. All Radiological Controls Technicians will be qualified through training and examination in each area or specific task related to their radiological controls functions prior to their performance of those tasks.

6.4 TRAINING

6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the cognizance of the Plant Training Manager and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977 Appendix "A" of 10 CFR Part 55 except that Radiological Controls training may be under the direction of Vice President-Radiological and Environmental Controls.

6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Plant Training Manager and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976.

6.5 REVIEW AND AUDIT

6.5.1 Technical Review and Control

The Office of TMI-2 Division Director and Support Division Vice-Presidents within GPU Nuclear Corporation as indicated in Organization Plan Figure 1.1, shall be responsible for ensuring the preparation, review, and approval of documents required by the activities within their functional area of responsibility for TMI-2. Implementing approvals shall be performed at the cognizant section manager/director level or above. Independent safety review and audit shall be conducted in accordance with this Technical Specification.

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 Deleted.

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. (Note: The requirement for a Senior Reactor Operator's License applies during Mode 1 only.) 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 required by Specification 3.9.13 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 in accordance with 10 CFR 50.4 unless otherwise noted.

ANNUAL REPORTS¹

6.9.1.4 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.

6.9.1.5 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 man rem exposure according to work and job functions,² e.g., reactor operations and surveillance, inservice

¹A 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.

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



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 37 TO FACILITY OPERATING LICENSE NO. DPR-73

GPU NUCLEAR CORPORATION

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-320

INTRODUCTION

By letter dated December 27, 1988, GPU Nuclear Corporation (GPUN or the licensee) requested the approval of a change to the Appendix A Technical Specifications of Facility Operating License No. DPR-73 for Three Mile Island Nuclear Station, Unit No. 2. On July 13, 1989 the licensee submitted Supplement 1 to the requested technical specification change. The proposed amendment would revise technical specifications related to unit staff qualifications once the facility completes defueling and enters Mode 2.

DISCUSSION AND EVALUATION

The licensee proposes to revise Appendix A Technical Specifications Sections 6-3, Unit Staff Qualifications and Section 6.8 Procedures. The proposed changes would resolve potential inconsistencies between qualifications of unit staff personnel, required by the Technical Specifications, and the plant conditions after defueling.

Section 6.3, Unit Staff Qualifications requires that unit staff personnel must comply with ANSI-N18.1 of 1971. ANSI-N18.1 of 1971 states that certain positions of the plant staff either hold or be capable of acquiring an operator's license. Additionally, the ANSI standard states that the Plant Manager position requires either an individual or designated alternate have a Senior Reactor Operating (SRO) license or have the background required to sit for the exam.

Once defueling of TMI-2 is completed and the licensee has demonstrated that the possibility of an inadequate criticality is precluded then the licensee can, as allowed by the current Technical Specifications, transition to Mode 2. In Mode 2 the Technical Specifications no longer require licensed operators to be present at TMI-2.

The licensee has proposed adding to Section 6.3.1 the statement that once the facility enters Mode 2 the requirements of ANSI-N18.1 of 1971 pertaining to unit staff operator qualifications not apply. The licensee asserts that since there will no longer be a requirement for SROs after they enter Mode 2, the remainder of the unit staff should not be required to have an SRO license or be required to have the background to sit for the examination.

The licensee however has stated that during Modes 2 and 3, GPU Nuclear will continue to apply the educational and experience requirements of ANSI-N18.1 of 1971 to the TMI-2 staff with the exception of unit staff licensed operator requirements and unless otherwise noted in the Technical Specifications.

The staff finds the proposed change acceptable and sees no justification for the SRO license requirements for the position of Plant Manager once the facility is defueled.

Section 6.8, Procedures requires, under 6.8.3.1.b.(1), that for those plant procedures which affect the operational status of the unit systems or equipment, proposed changes to the procedures must be approved by two members of the unit management staff, at least one of whom holds a SRO license. The licensee proposes to delete the requirement that one of the individuals holds a SRO license once the plant is defueled and transitions to Mode 2. Again the licensee asserts that once the plant is defueled then there would be no justification for retaining the requirement for a member of the Unit Management staff to maintain a SRO license.

The staff finds no justification for the SRO license requirement once the facility is defueled and has determined that the proposed change is acceptable.

ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). 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.

CONCLUSION

We have 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 (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: Michael T. Masnik

Dated: February 21, 1990