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 AND ORGANIZATION PLAN 23 (TAC NO. 71395)

The Commission has issued the enclosed Amendment No. 38 to Facility Operating License No. DPR-73 for the Three Mile Island Nuclear Station, Unit No. 2, in response to your letter dated November 23, 1988 (Technical Specification Changes Request No. 61).

The amendment modified Appendix A Technical Specifications allowing the consolidation of the TMI-1 and TMI-2 Radiological Controls Departments into a site organization.

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

Your letter of November 23, 1988, also requests a revision to the TMI-2 Organization Plan. The current Organization Plan identifies a separate Radiological Controls Department on both the site and Corporate levels. Your proposed revision to the Organization Plan would identify a TMI Site Radiological Controls Department consistent with Amendment No. 38 to facility Operating License No. DPR-73.
The proposed changes will not eliminate any vital positions or functions within the TMI-2 organization, nor will it change the personnel qualifications for these positions. It represents an organizational realignment consistent with the progress of the cleanup. We, therefore, approve your proposed revision to the Organization Plan. The enclosed Figures 1.1 and 1.2, Rev. 23 should be substituted for the existing GPUN Organization Plan, Figures 1.1 and 1.2.

Sincerely,

[Signature]

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. 38 to DPR-73
2. Safety Evaluation
3. Revision 23 to Organization Plan

cc w/enclosures:
See next page
Mr. M. B. Roche

April 26, 1990

The proposed changes will not eliminate any vital positions or functions within the TMI-2 organization, nor will it change the personnel qualifications for these positions. It represents an organizational realignment consistent with the progress of the cleanup. We, therefore, approve your proposed revision to the Organization Plan. The enclosed Figures 1.1 and 1.2, Rev. 23 should be substituted for the existing GPUN Organization Plan, Figures 1.1 and 1.2.

Sincerely,

/s/

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

Enclosures:
1. Amendment No. 38 to DPR-73
2. Safety Evaluation
3. Revision 23 to Organization Plan

cc w/enclosures:
See next page
DATED: April 26, 1990

AMENDMENT NO. 38 TO FACILITY OPERATING LICENSE NO. DPR-73

Docket File:
MRC 6-Local PDRs
PUD-4 Reading
SVarga, 14/E/4
BBoger 14/A/2
JStolz
SNorris
MMasnak
OGC (for information only)
Dhagan, 3302 MNBB
EJordan, 3302 MNBB
GHill (4)
Wanda Jones
JCalvo
ACRS (10)
GPA/PA
OC/LFMB

cc: Plant Service list
Mr. M. B. Roche  
GPU Nuclear Corporation  Unit No. 2

cc:

Regional Administrator, Region I  
U.S. Nuclear Regulatory Commission  
475 Allendale Road  
King of Prussia, PA 19406

Dr. Judith H. Johnsrud  
Environmental Coalition on Nuclear Power  
433 Orlando Avenue  
State College, PA 16801

Ernest L. Blake, Jr., Esquire  
Shaw, Pittman, Potts, and Trowbridge  
2300 N Street, N.W.  
Washington, DC 20037

Secretary  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555

Sally S. Klein, Chairperson  
Dauphin County Board of Commissioners  
Dauphin County Courthouse  
Front and Market Streets  
Harrisburg, PA 17120

Thomas M. Gerusky, Director  
Bureau of Radiation Protection  
Department of Environmental Resources  
P. O. Box 2063  
Harrisburg, PA 17120

Ad Crable  
Lancaster New Era  
8 West King Street  
Lancaster, PA 17601

U.S. Department of Energy  
P. O. Box 88  
Middletown, PA 17057

David J. McGoff  
Office of LWR Safety and Technology  
NE-23  
U.S. Department of Energy  
Washington, DC 20545

Three Mile Island Nuclear Station  
Frank Lynch, Editorial  
The Patriot  
812 Market Street  
Harrisburg, PA 17105

Robert B. Borsum  
Babcock & Wilcox  
Nuclear Power Division  
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1700 Rockville Pike  
Rockville, MD 20852

Marvin I. Lewis  
7801 Roosevelt Blvd. #62  
Philadelphia, PA 19152

Jane Lee  
183 Valley Road  
Etters, PA 17319

Walter W. Cohen, Consumer Advocate  
Department of Justice  
Strawberry Square, 14th Floor  
Harrisburg, PA 17127

Mr. Edwin Kinter  
Executive Vice President  
GPU Nuclear Corporation  
100 Interpace Parkway  
Parsippany, NJ 07054

U.S. Environmental Prot. Agency  
Region III Office  
Attn: EIS Coordinator  
841 Chestnut Street  
Philadelphia, PA 19107

Francis I. Young  
Senior Resident Inspector (THI-1)  
U.S.N.R.C.  
Post Office Box 311  
Middletown, Pennsylvania 17057
Mr. M. B. Roche  
GPU Nuclear Corporation  Unit No. 2

cc:

G. Kuehn  
GPU Nuclear Corporation

J. J. Byrne  
GPU Nuclear Corporation

Ms. Becky Harty  
Health Physics Department  
2955 George Washington Way  
Richland, Washington 99352

Three Mile Island Nuclear Station

R. E. Rogan  
GPU Nuclear Corporation

W. J. Marshall  
GPU Nuclear Corporation
1. The Nuclear Regulatory Commission (the Commission) has found that:

A. The application for amendment by GPU Nuclear Corporation, (the licensee) dated November 23, 1988, 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. 38, 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

[Signature]

John F. Stolz, Director
Project Directorate I-4
Division of Reactor Projects - 1/11
Office of Nuclear Reactor Regulation

Attachment:
Changes to the Technical Specifications

Date of Issuance: April 26, 1990
ATTACHMENT TO LICENSE AMENDMENT NO. 38

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following page of the Appendix A Technical Specifications with the attached page. The revised page is identified by amendment number and contains a vertical line indicating the area of change.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>6-3</td>
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</table>
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 Management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. 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.
SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 38 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 November 23, 1988, GPU Nuclear Corporation (GPUN or the licensee) requested the approval of a change to the Appendix R Technical Specifications of Facility Operating License No. DPR-73 for Three Mile Island Nuclear Station, Unit No. 2. The proposed amendment would revise the technical specification by changing the title of the Manager, Radiological Controls TMI-2.

DISCUSSION AND EVALUATION

Following the completion of the current defueling effort at TMI-2, the licensee has proposed to consolidate the TMI-1 and TMI-2 Radiological Controls Departments into a single site organization. The licensee has determined that the reduction in the level of effort associated with the TMI-2 cleanup once defueling ceased warrant a reduction in the size of the TMI-2 Radiological Controls Department. Consolidation of the TMI-1 and TMI-2 radiological controls organizations would allow for this reduction in effort while retaining the appropriate level of management control.

Once the consolidation is effective, the position of Manager, Radiological Controls TMI-2, would be abolished and the downsized TMI-2 Radiological Controls Organization would report to a TMI site manager who in turn would report directly to the GPU Nuclear Radiological Controls Organization.

Section 6.3.2 of the Appendix A Technical Specifications specifies the required qualifications necessary for the "Manager, Radiological Controls TMI-2". The licensee proposes to delete the title of the Manager, Radiological Controls TMI-2 from Section 6.3.2 and to replace it with the phrase "The Management position responsible for radiological controls ...". There would be no change in the required qualifications for the position.

The staff finds the proposed change acceptable and has determined that the establishment of a consolidated Site Radiological Controls Department appropriate.
ENVIRONMENTAL CONSIDERATION

This amendment relates to changes to 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. Hasnik

Dated: April 26, 1990
ORGANIZATION PLAN CHANGE 23

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following figures of the TMI-2 Organization Plan with the attached figures. The revised figures are identified by revision number and contain vertical lines indicating the areas of change.

<table>
<thead>
<tr>
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<tr>
<td>1.2</td>
<td>1.2</td>
</tr>
</tbody>
</table>
GPU NUCLEAR CORP. ORGANIZATION PLAN

FIGURE 1.1

OFFICE OF THE PRESIDENT
GPU NUCLEAR CORPORATION

PRESIDENT

EXECUTIVE
VICE PRESIDENT

LEGAL SERVICES
OUTAGE
MANAGEMENT
INDEPENDENT
SAFETY REVIEW
COMMUNICATIONS
CORPORATE
SECRETARY

OYSTER CREEK

TMI-1
TMI-2

TECHNICAL
FUNCTIONS
ADMINISTRATION
& FINANCE
NUCLEAR
ASSURANCE
CORPORATE
SERVICES

SYSTEMS
ENGINEERING
OTHER
ENGINEERING
SUPPORT

ENVIRONMENTAL
CONTROLS
QUALITY
ASSURANCE

RADIOLOGICAL
CONTROLS
TMII
TRAINING
& EDUCATION

EMERGENCY
PREPAREDNESS
PLANT TRAINING
TMII

SECURITY

* THIS POSITION WILL BE ELIMINATED IN JUNE 1990 WHEN THE PRESENT EXECUTIVE VICE PRESIDENT RETIRES.
ORGANIZATION PLAN TMI-2

FIGURE 1.2

GPU NUCLEAR CORPORATION

TMI-2 DIRECTOR

PROGRAM CONTROLS

SITE OPERATIONS

LICENSING & NUCLEAR SAFETY

RADIOLOGICAL CONTROLS

WASTE MANAGEMENT

PLANT MAINTENANCE

PLANT OPERATIONS

ENGINEERING

SPECIAL PROJECTS & CONSTRUCTION SUPPORT

LICENSING

OFFICE OF THE PRESIDENT GPUN CORP.

SWIFT SUPERVISORS/SHIFT FOREMEN (SRO)

(2)

CONTROL ROOM OPERATOR (RO)

(2)

FUEL HANDLING SRO'S

(2)

AUXILIARY OPERATOR

(2)

SAFETY REVIEW GROUP

(1)

(1) ADVISORY TO THE OFFICE OF THE DIRECTOR TMI-2 WITH RESPONSIBILITY & AUTHORITY TO NOTIFY THE OFFICE OF THE PRESIDENT OF INADEQUATE CONSIDERATIONS OF NUCLEAR & RADIOLOGICAL SAFETY ISSUES.

(2) UPON ENTRY INTO FACILITY MODE 2, STAFFING OF THESE POSITIONS IS NO LONGER REQUIRED.