

November 6, 1990

Docket No. 50-320

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Dr. Robert L. Long  
Director, Corporate Services/  
Director, TMI-2  
GPU Nuclear Corporation  
Post Office Box 480  
Middletown, Pennsylvania 17057

Dear Dr. Long:

SUBJECT: THREE MILE ISLAND NUCLEAR STATION UNIT NO. 2 - ISSUANCE OF  
AMENDMENT 39 (TAC NO. 73780)

The Commission has issued the enclosed Amendment No. 39 to Facility Operating License No. DPR-73 for the Three Mile Island Nuclear Station, Unit No. 2, in response to your letter dated June 30, 1989 and revised by letters dated January 22, 1990 and August 31, 1990. (Technical Specification Change Request No. 65).

The amendment modifies Appendix A Technical Specifications revising the administrative requirements associated with periodic audits of the unit's activities.

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

Sincerely,

original signed by

Michael T. Masnik, Senior Project Manager  
Non-Power Reactor Decommissioning and  
Environmental Project Directorate  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 39 to DPR-73
- 2. Safety Evaluation

cc w/enclosures:  
See next page

[MM AMENDMENT 39]

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

November 6, 1990

Docket No. 50-320

Dr. Robert L. Long  
Director, Corporate Services/  
Director, TMI-2  
GPU Nuclear Corporation  
Post Office Box 480  
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Sincerely,

A handwritten signature in cursive script that reads "Michael T. Masnik".

Michael T. Masnik, Senior Project Manager  
Non-Power Reactor Decommissioning and  
Environmental Project Directorate  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

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2. Safety Evaluation

cc w/enclosures:  
See next page

Dr. R. L. Long  
GPU Nuclear Corporation

Three Mile Island Nuclear Station  
Unit No. 2

cc:

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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. 39  
License No. DPR-73

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment filed by GPU Nuclear Corporation, (the licensee), dated June 30, 1989 as supplemented on January 22, 1990 and August 31, 1990, complies with the 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 I;
  - 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 set forth in 10 CFR Chapter I;
  - 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.

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P PNU



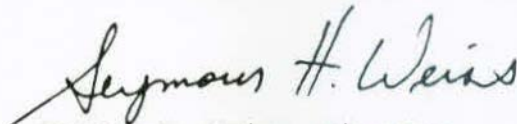
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.C.(2) of Facility Operating License No. DPR-73 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 39, 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



Seymour H. Weiss, Director  
Non-Power Reactor, Decommissioning and  
Environmental Project Directorate  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: November 6, 1990

ATTACHMENT TO LICENSE AMENDMENT NO. 39

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 area of change.

Remove

6-7

6-8

Insert

6-7

6-8

## ADMINISTRATIVE CONTROLS

- i. Special reviews, investigations or analyses and reports thereon as requested by the Office of the Director TMI-2 or other manager reporting directly to the Office of the Director TMI-2.
- g. Written summaries of audit reports in the area specified in Section 6.5.3.
- h. Recognized indications of an unanticipated deficiency in some aspect of design or operation of structures, systems, or components, that could affect nuclear safety or radioactive waste safety.
- i. Any other matters involving safe operation of the nuclear power plant which the SRG or the independent safety reviewers deems appropriate for consideration, or which are referred to the SRG or the independent safety reviewers.

6.5.2.6 For those subjects which are REVIEW SIGNIFICANT the Independent Safety Review will be performed by an individual(s) meeting the qualifications of Section 6.5.4.7 (until implementation of IOSRG) or Section 6.5.2.8 (upon implementation of IOSRG).

### RECORDS

6.5.2.7 Reports of reviews encompassed in Section 6.5.2.5 shall be maintained in accordance with 6.10.

### QUALIFICATIONS FOR INDEPENDENT SAFETY REVIEWERS (Upon Implementation of IOSRG)

6.5.2.8 The independent safety reviewer(s) shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five years of professional level experience in the area being reviewed or have nine years of appropriate experience in the field of his or her speciality. An individual performing reviews may possess competence in more than one specialty area. Credit toward experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years.

### 6.5.3 Audits

6.5.3.1 Audits of unit activities shall be performed in accordance with the TMI-2 Recovery QA Plan. These audits shall encompass:

- a. During Modes 1, 2 and 3, the conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions. The audit frequency shall be at least once per 12 months.
- b. During Modes 1, 2 and 3, the performance, training and qualifications of the entire unit staff. The audit frequency shall be at least once per 24 months.
- c. During Modes 1, 2 and 3, the verification of the nonconformances and corrective actions program as related to actions taken to correct deficiencies occurring in unit equipment, structures, systems or methods of operation that affect nuclear safety. The audit frequency shall be at least once per 12 months.

## ADMINISTRATIVE CONTROLS

- d. During Modes 1, 2 and 3, the performance of activities required by the Recovery Quality Assurance Plan to meet the criteria of Appendix "B", 10 CFR 50. The audit frequency shall be at least once per 24 months.
- e. During Mode 1, the Emergency Plan and implementing procedures. The audit frequency shall be at least once per 12 months.
- f. Deleted.
- g. During Modes 1, 2 and 3, the Radiation Protection Plan and implementing procedures. The audit frequency shall be at least once per 12 months.
- h. During Modes 1, 2 and 3, the Fire Protection Program and implementing procedures. The audit frequency shall be at least once per 24 months.
- i. During Modes 1, 2 and 3, an independent fire protection and loss prevention program inspection and technical audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. During Modes 1, 2 and 3, an inspection and technical audit of the fire protection and loss prevention program, by an outside qualified fire consultant at intervals no greater than 3 years.
- k. During Modes 1, 2 and 3, any other area of unit operation considered appropriate by the SRG, the Manager, SRG's immediate supervisor, (until implementation of IOSRG), the IOSRG, other managers reporting directly to the Office of the Director TMI-2, the Office of the Director TMI-2, or the Office of the President - GPUNC. Any other areas required to be audited by QA will be identified to the appropriate QA Management level.

### RECORDS

6.5.3.2 Audit reports encompassed by sections 6.5.3.1 shall be forwarded for action to the management positions responsible for the areas audited and either the SRG, (until implementation of IOSRG) or the IOSRG (upon its implementation), within 60 days after completion of the audit. The SRG, (until implementation of IOSRG) or the IOSRG will review specified audits performed by QA and make corrective action recommendations as appropriate.

### 6.5.4 Safety Review Group (SRG)

#### FUNCTION

6.5.4.1 The SRG shall be a full-time group of engineers, independent of the Site Operations and Engineering staff, and located onsite within the TMI-2 division. (See Organization Plan Figure 1.2.)

#### APPLICABILITY

6.5.4.1.1 Until implementation of IOSRG.





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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 39 TO FACILITY OPERATING LICENSE NO. DPR-73  
GPU NUCLEAR CORPORATION  
THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2  
DOCKET NO. 50-320

1.0 INTRODUCTION

By letter dated June 30, 1989, superseded by a letter dated January 22, 1990 and revised by letter dated August 31, 1990, 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. The proposed amendment would revise the technical specifications by revising the administrative requirements associated with periodic audits of TMI-2 activities.

In anticipation of the significant reduction in plant cleanup related activities, after the completion of the current defueling effort, the licensee proposed on June 30, 1989 to make periodic audits applicable to specific facility modes and to, in some cases, reduce the audit frequency to reflect the then current and future conditions of the facility.

Section 6.5.3, "Audits" of the Appendix A Technical Specifications specifies audits for eleven facility activities. The current specification does not specify the applicability of the activity audits to any particular mode, implying that the audit frequency is applicable to all modes. The licensee proposes to revise seven of the eleven facility activities to be applicable during Modes 1, 2, and 3. There are only three modes specified for TMI-2. At the time the licensee submitted the proposed change, the facility was in Mode 1. The licensee transitioned through Mode 2 to Mode 3 on April 27, 1990. Therefore, for the seven activities (6.5.3.1.a, 6.5.3.1.d., 6.5.3.1.g., 6.5.3.1.h., 6.5.3.1.i., 6.5.3.1.j. and 6.5.3.1.k.) there is effectively no change in applicability. The staff finds the proposed change acceptable.

Section 6.5.3.1.e specifies the audit frequency for the Emergency Plan implementing procedures. Currently an audit must be conducted at least once per 12 months irrespective of facility Mode. The licensee proposes that the requirement be applicable only during Mode 1. Since the licensee is currently in Mode 3, the request essentially deletes the requirement for an audit of the Emergency Plan from the TMI-2 Technical Specifications. TMI-1 and TMI-2 have had a combined site Emergency Plan since February 10, 1986. The requirement for the Emergency Plan is also contained in Section 6.5.3, "Audit", of the TMI-1 Technical Specifications. Section 6.5.3.1.e of the TMI-1 Technical Specifications requires an audit at least once per 12 months which is consistent with the current TMI-2 Technical Specifications. Since the Emergency Plan is now a site plan and the TMI-1 technical specifications

require an audit of the plan at the same frequency that the TMI-2 technical specifications require, the staff finds the proposed change acceptable and consistent with the staff's objective to reduce redundancy at the TMI site.

Section 6.5.3.1.f specifies the audit frequency for the Security Plan implementing procedures. Currently an audit must be conducted at least once per 12 months. The licensee proposes to delete the TMI-2 Technical Specifications requirement for an audit of the security plan implementing procedures. The TMI site has a combined site Security Plan and implementing procedures. The current TMI-1 Technical Specifications, Section 6.5.3.1.f, requires an audit of the TMI Site Security Plan and implementing procedures every 12 months. The audits include a review of the TMI-2 facilities and personnel to the extent necessary to determine compliance. The staff finds the proposed change acceptable and consistent with the staff's objective to reduce redundancy at the TMI site.

Section 6.5.3.1.b specifies the audit frequency for performance, training, and qualifications of the unit staff (Training and Qualifications Audit). The current technical specifications specify an audit frequency of at least once per 12 months. The licensee states that with the completion of the defueling program and the significant cutback in cleanup activity at the TMI-2 site, the frequency for performing the Training and Qualifications Audits can be extended. The staff finds that because of the substantial cutback in cleanup personnel the change in audit frequency is warranted. Therefore the staff approves the licensee's proposal to change the frequency for the training and qualifications audit to once every 24 months.

Section 6.5.3.1.c specifies the audit frequency for verification of the nonconformance and corrective actions program (Corrective Action Audit) that affect nuclear safety. The current requirements is that an audit be conducted at least once per 6 months. The licensee initially proposed in their June 30, 1989 request that the audit frequency be extended to at least once per 24 months. After discussion between the NRC staff and the licensee on July 18 and 19, 1990 the licensee in a letter dated August 31, 1990 agreed to perform corrective actions audits once every 12 months. The reduction in the licensee's cleanup activities and the lack of any remaining significant nuclear safety issues was offered by the licensee as justification for the proposed change. The staff finds the revised frequency of once every 12 months acceptable.

## 2.0 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.

3.0 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: November 6, 1990