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September 19, 1983

Docket No. 50-320

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Mr. D. K. Kanga, Director
 Three Mile Island Unit 2
 GPU Nuclear Corporation
 P.O. Box 407
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Dear Mr. Kanga:

Subject: Three Mile Island Nuclear Station, Unit 2
 Operating License No. DPP-73
 Docket No. 50-320
 Technical Specification Change Request No. 40

The Nuclear Regulatory Commission has issued the enclosed Amendment of Order for the Three Mile Island Nuclear Station, Unit 2. This Amendment of Order for the Proposed Technical Specifications is for changes to the administrative section as requested in your letter dated November 29, 1982, as amended by letter dated February 25, 1983. The NRC has also modified some of your requests as discussed with J. Byrne and J. Larson of your staff. The amended requirements had been imposed by the Order of the Director of the Office of Nuclear Reactor Regulation on February 11, 1983 with amendments to date.

This Amendment of Order is effective as of November 1, 1983. From the date of issuance of this Amendment of Order until the effective date, the licensee shall operate under the old organizational structure.

Also approved are your requests for Organization Plan, Revision 6, dated November 29, 1982 as amended by Letters dated February 11, 1983 and February 22, 1983, and Organization Plan, Revision 7, dated June 14, 1983. Revision 7 has been modified to incorporate Revision 6.

Since the February 11, 1983 Order imposing the Proposed Technical Specifications is currently pending before the Atomic Safety and Licensing Board, the staff will be advising the Licensing Board of this Amendment of Order through a Notice of Issuance of Amendment of Order and a Motion to Conform Proposed Technical Specifications in Accordance Therewith.

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Mr. B. K. Kanga

-2-

Copies of the related Safety Evaluation and revised pages for the proposed Technical Specifications are enclosed.

Sincerely,

Original signed by
B. J. Snyder

Bernard J. Snyder, Program Director
Three Mile Island Program Office
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment of Order
2. Safety Evaluation
3. Proposed Technical Specification Page Changes
4. Approved Organization Plan, Revision C/7

cc: J. Barton
J. Byrne
J. Larson
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(see attached)

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of)

GENERAL PUBLIC UTILITIES NUCLEAR)
CORPORATION)

(Three Mile Island Nuclear Station,)
Unit 2))

Docket No. 50-320

AMENDMENT OF ORDER

I.

GPU Nuclear Corporation, Metropolitan Edison Company, Jersey Central Power and Light Company and Pennsylvania Electric Company (collectively, the licensee) are the holders of Facility Operating License No. DPR-73, which had authorized operation of the Three Mile Island Nuclear Station, Unit 2 (TMI-2) at power levels up to 2772 megawatts thermal. The facility, which is located in Londonderry Township, Dauphin County, Pennsylvania, is a pressurized water reactor previously used for the commercial generation of electricity.

By Order for Modification of License, dated July 20, 1979, the Licensee's authority to operate the facility was suspended and the Licensee's authority was limited to maintenance of the facility in the present shutdown cooling mode (44 Fed. Reg. 45271). By further Order of the Director, Office of Nuclear Reactor Regulation, dated February 11, 1980, a new set of formal license requirements was imposed to reflect the post-accident condition of the facility and to assure the continued maintenance of the current safe, stable, long-term cooling condition of the facility (45 Fed. Reg. 11292).

Although these requirements were imposed on the licensee by an Order of the Director of Nuclear Reactor Regulation, dated February 11, 1980, the TMI-2 license has not been formally amended. The requirements are reflected in the proposed Recovery Mode Technical Specifications presently pending before the Atomic Safety and Licensing Board. Hereafter in this Amendment of Order, the requirements in question are identified by the applicable proposed Technical Specification.

II.

By letters dated November 29, 1982, as amended by letter dated February 25, 1983, the licensee requested changes to the proposed Technical Specifications (PTS), Appendix A for Three Mile Island, Unit 2 (TMI-2). The licensee has requested staff approval of modifications to section 6 of the PTS that would; (1) change the titles of certain managerial personnel; (2) modify the authority of certain managerial personnel; (3) significantly modify the technical review and audit requirements; (4) delete certain limits and requirements no longer applicable to TMI-2; (5) reflect the effect on procedures as they relate to the new review organizations and NRC; (6) increase the control over temporary changes; (7) delete certain reporting requirements; and (8) modify the record retention requirements to be consistent with other proposed changes.

The major changes are contained in items 3 and 5. Under item 3, the licensee has requested the replacement of the current Plant Operations Review Committee (PORC) with a Safety Review Group (SRG). The licensee has proposed that the SRG satisfy the regulatory requirement for independent review and audit. The SRG is a full-time group whereas the PORC was an organization of part-time reviewers who also had other plant related duties. It is the staff's opinion that the proposed organization will provide a more thorough review of applicable documents and because of the full-time commitment, will provide more consistency in their reviews. To maintain the independent role, the Manager, SRG reports to the Licensing & Nuclear Safety Director, although he has the authority and the responsibility to bring to the attention of the Office of the President of GPU Nuclear any issues he believes are not being addressed with adequate consideration of nuclear or radiological safety.

Under item 5, the licensee has requested an elimination of the requirement for prior NRC approval of Recovery Operations Plan (ROP) implementing procedures not specifically addressed in section 6.8.2. It is the staff's opinion that corrections such as typographical errors, system labels, etc., do not need NRC review. However, any procedures that affect the health and safety of the public shall be reviewed by NRC.

The staff's safety assessment of this matter including discussions of other changes is set forth in the concurrently issued Safety Evaluation. From the date of issuance of this Amendment of Order until the effective date, the licensee shall operate under the old organizational structure. Since the February 11, 1980 Order imposing the Proposed Technical Specifications is currently pending before the Atomic Safety and Licensing Board, the staff will be advising the Licensing Board of this Amendment of Order through a Notice of Issuance of Amendment of Order and a Motion to Conform Proposed Technical Specifications in Accordance Therewith.

It is further determined that the modification does not authorize a change in effluent types or total amounts ^{nor} an increase in power level and will not result in any significant environmental impact. In light of this determination, it was concluded that the instant action is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR 51.5 (d)(4), that an environmental impact statement or environmental impact appraisal need not be prepared herewith.

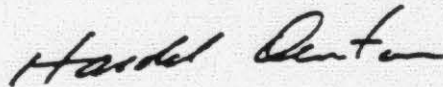
III.

Accordingly, pursuant to the Atomic Energy Act of 1954, as amended, the Director's Order of February 11, 1980, is hereby revised to incorporate the deletions, additions, and modifications set forth in Attachment A hereto. For further details with respect to this action, see (1) Letter to B. Snyder, USNRC, from R. Arnold, Met-Ed/GPU, Technical Specification Change Request

No. 40 dated November 29, 1982, (2) Amendment to Technical Specification Change Request No. 40, dated February 25, 1983, (3) Organization Plan, Revision 6, dated November 29, 1982, (4) Amendments to Organization Plan, Revision 6, dated February 11, 1983 and February 22, 1983, (5) Organization Plan Revision 7, dated June 14, 1983, and (6) The Director's Order of February 11, 1980.

All of the above documents are available for inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the Commission's Local Public Document Room at the State Library of Pennsylvania, Government Publications Section, Education Building, Commonwealth and Walnut Streets, Harrisburg, Pennsylvania 17126.

FOR THE NUCLEAR REGULATORY COMMISSION



Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Effective Date: November 1, 1983
Dated at Bethesda, Maryland
Issuance Date: September 19, 1983

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

Introduction

By letters dated November 29, 1982, (Reference 1), as amended by letter dated February 25, 1982, (Reference 2), GPU Nuclear Corporation (GPUNC) requested an amendment to the Proposed Technical Specifications (PTS), Appendix A and Appendix B for Three Mile Island, Unit 2 (TMI-2). The proposed amendment of order for Appendix A involves substantial changes to Section 6, the administrative controls section of the Proposed Technical Specifications, to reflect major changes in the GPU Nuclear organization and the internal safety review process. The requested amendment to Appendix B will be the subject of separate correspondence in License Amendment 22.

Discussion and Evaluation

The licensee has requested changes to section 6 of the PTS for the following reasons: (1) to change the titles of certain managerial personnel, (2) to modify the authority of certain managerial personnel, (3) to significantly change the technical review and audit requirements, (4) to delete certain limits and requirements no longer applicable to TMI-2, (5) to reflect the

effect on procedures as they relate to the new review organizations and NRC, (6) to increase the control over temporary changes, (7) to delete certain reporting requirements, and (8) modify the record retention requirements to be consistent with the other proposed changes.

Since there are substantial changes being made to of the PTS's a brief discussion and evaluation of each individual section follows:

Section 1.14 - The licensee has proposed to add to the Proposed Technical Specifications a definition of Review Significance. The staff therefore concurs with the incorporation of this section. In that definition, GPU includes items that are "Important to Safety" (ITS). It should be noted that the TMIPO and GPU to date do not have an agreed upon list of items that are important to safety as defined in the TMI-2 Quality Assurance Plan. If conflicts do arise in this area the NRC will be the final determinant on ITS items.

Section 6.1 Responsibility - This section has been revised to reflect that the Director, TMI-2 has become the position responsible for overall unit operation.

We have reviewed the change to section 6.1 and find that responsibility for unit operation is appropriately assigned to the Director, TMI-2. We therefore find this change acceptable.

Section 6.3 Unit Staff Qualifications - The title, Manager - Radiological controls has been changed to Radiological Controls Director, TMI-2. A deputy position with the same qualifications as the Director has also been added.

The change in the title does not affect the functional requirements of this position. By adding a deputy that must also meet or exceed the qualifications of Regulatory Guide 1.8, September 1975, no degradation of staffing requirements will result. Therefore we find this change acceptable.

Section 6.5 Review and Audit - The licensee has revised all of section 6.5. It is GPUNC's opinion that this revision provides for interdisciplinary reviews and independent technical and safety reviews of specified documents. It is proposed that the TMI-2 Safety Review Group (SRG) satisfy the requirements for an independent, full-time, safety engineering staff as required in Regulatory Guide 1.33, 10 CFR 50 36(5); 10 CFR 50, Appendix B, Section III; and ANSI/ANS - 3.1-1978. The SRG will be a group of technical personnel who are assigned onsite at TMI, and report within the TMI-2 Division independent of unit operations and engineering functions, but no lower in the organization than one level below the Office of the Director, TMI-2. The SRG will conduct an ongoing program to evaluate the technical adequacy of procedures and design changes important to safe operation of the plant as defined by the Organization Plan and implementing procedure(s). The SRG will evaluate TMI-2 operations from a safety perspective. Additionally, management audits of unit activities now performed under the cognizance of the GRC will continue to be performed

under the cognizance of the QA organization and the results will be forwarded to SRG, which will make recommendations on followup of audit findings as appropriate.

In replacing the function of PORC and the GRC, the SRG had to be placed in the GPUNC organization in a way that assures independence from both plant operations and engineering. The appropriate placement was determined by the licensee to be within the Licensing and Nuclear Safety Department which reports directly to the Office of the Director, TMI-2.

It is the licensee's opinion that this organization operates independently from both plant operations and engineering. The Manager, SRG is advisor to the Office of the Director, TMI-2 on all safety matters. However he has the authority and responsibility to bring to the attention of the Office of the President any issues he believes are not being addressed with adequate consideration of nuclear or radiological safety.

The TMI-2 SRG functions as most licensee off-site review groups except that almost all of the technical resources are located within TMI-2 Division.

The SRG will consist of a Manager plus at least five qualified engineers. In addition, several technical analysts are included in this group to conduct operational trend analyses previously performed by the Technical Specification Compliance Group. The qualification requirements for these Technical Analysts are not as extensive as required for safety review engineers because the Technical Analysts will not perform sole safety review functions for SRG.

Required Independent Safety Reviews will be performed by SRG members with qualifications comparable to previous qualifications for GRC members.

Although not contained in the Technical Specifications, several other corporate review groups exist. NRC is aware of the General Office Review Board (GORB), Safety Advisory Board (SAB), and Technical Assessment and Assistance Group (TAAG). The GORB and the SAB report directly to the Office of the President, GPUNC and the TAAG reports to the Office of the Director, TMI-2, and are responsible for various independent assessments. For flexibility considerations in the unique TMI-2 circumstances, GPUNC does not wish to include these voluntary groups in the Technical Specifications. There is also no regulatory basis to require their inclusion. However, GPUNC will advise the NRC of any intentions to disband these groups in advance of any actual changes. Should such changes occur in any of the other review groups, the NRC will reassess the GPUNC independent review process.

In addition to the requested changes, the NRC staff has added wording to section 6.5.4.7 to state requirements for the Manager, SRG.

Because of the unique requirements of TMI-2 and its unique organizational structure, the staff finds that the licensee's justification for replacing the PORC with the SRG acceptable.

Section 6.6 Reportable Occurrence Action - This change deletes Specification 6.6.1.C which stated internal review and distribution requirements for a monthly and quarterly report on the March 28, 1979 accident and related events that occurred through January 15, 1980.

The staff has verified that a final copy of the subject report was submitted to the NRC on May 11, 1981 in accordance with the requirements in the PTS. Therefore 6.6.1.C is no longer necessary and the request to delete it is acceptable to the NRC.

Section 6.7 Safety Limit Violation - The licensee has requested to delete this section because Section 2 of the PTS¹ does not contain any safety limits to violate. The staff agrees that Section 2.0 (Safety Limits) is not presently applicable to TMI-2 and approves the change.

Section 6.8 Procedures - Presently, 6.8.1(g) lists written procedures that should be established for the recovery mode that could reduce the margin of safety. This includes procedures that (1) directly relate to core cooling, (2) could cause the magnitude of radiological releases to exceed NRC limits, (3) increase the likelihood of failures in systems important to nuclear safety and radioactive waste processing or storage, and (4) alter the distribution or processing of significant quantities of stored radioactivity or radioactivity being released through known flow paths. However, it is the licensee opinion that those procedures are already required per 6.8.1(a) which references appendix A of Regulatory Guide 1.33, Revision 2, 1978.

The staff agrees that 6.8.1(a) and 6.8.1(g) are repetitive and concurs with the deletion of 6.8.1(g).

GPU requested the inclusion of a new 6.8.1(g) to satisfy the requirements of Generic Letter 82-12 dated June 15, 1982. The new section is not related to the old 6.8.1(g). The generic letter requested that all licensees take action to insure that the administrative sections of all technical specifications meet the working hour guidelines of 82-12. The licensee has requested the incorporation of Section 6.8.1(g) which states that procedures shall be in place that meet the requirements of the subject generic letter. It is the staff's opinion that the licensee revision meets the intent of the generic letter and therefore concurs with the change.

Section 6.8.2 has been revised to eliminate the requirement for prior NRC approval of Recovery Operations Plan implementing procedures but preserves NRC prior approval for specific Recovery Mode implementing procedures. However only those changes to recovery mode implementing procedures as defined in 6.8.2 will require prior NRC approval. Non-significant changes therefore will not require prior NRC approval, e.g., typographical errors, corrections for proper numbering, system labels, etc. Section 6.8.3 has also been revised to reduce the number of procedures to be approved by the Senior Reactor Operator to only those procedures which affect the operational status of unit systems or equipment.

It is the staff's opinion that the procedures that will no longer be reviewed by the staff or the SRO will not have a significant impact on the health and safety of the public; therefore we agree with the above proposed changes.

Section 6.9.1 Reporting Requirements

Section 6.9.1 has been changed to correct the title of the receiving official in the NRC regional office. Director of the Regional Office of Inspection and Enforcement has been changed to Regional Administrator.

This change is consistent with the NRC's organizational structure and therefore the staff finds the change acceptable.

Section 6.9.1.5 Annual Reports - Section 6.9.1.5.b.2 has been revised to add the airport manager's designee as an acceptable source of information on the movements of aircraft larger than 200,000 pounds.

It is the staff's opinion that the reliability of the subject information will be maintained and therefore finds the change acceptable.

Section 6.9.1.6 Radiation Safety Program Report (RSPR) - The requirement for submitting an initial Radiation Safety Program Report and quarterly status reports in response to Recommendation 4 of NUREG-0640, December 7, 1979, has been deleted.

On December 6, 1982, the NRC received the licensee's GPUNC Radiation Protection Plan. The staff agrees that the Radiation Protection Plan which will be reviewed and approved by the NRC before its implementation is acceptable as a replacement for the RSPR. Therefore the staff finds the change acceptable.

Section 6.9.1.8 Notification with Written Followup - The licensee has requested a modification to Section 6.9.1.8(c),(f) and (g) on licensee event reporting. Presently, these sections reference accidents analyzed in the SAR as a basis for reporting. GPU has added to the SAR reference, Technical Evaluation Reports (TER's) and safety evaluations previously submitted to the NRC.

On July 20, 1981 the staff issued an exemption to the requirements of 10 CFR Part 50.71(e) to License No. DPR-73 in response to a GPU request dated May 6, 1981. The exemption deleted the requirements to periodically update the TMI-2 final safety analysis report. The exemption stated that updated Technical Evaluation Reports (TER's) and safety evaluations that will be submitted to the NRC were an acceptable alternative to FSAR update for TMI-2. The licensee has therefore expanded the scope of accidents previously analyzed with the inclusion of TER's and NRC reviewed safety evaluations.

It is the staff's opinion that with the exemption provided on July 20, 1981, the scope should be expanded to include TER's and safety evaluations for the licensee event report discussions of 6.9.1.8(e)(f) and (g) and therefore concurs with the change.

Section 6.9.1.9 Thirty Day Written Reports - Section 6.9.1.9.e has been added to the PTS requiring a thirty day report for each event requiring activation of the Emergency Plan.

The staff finds this change will not adversely affect the intent of this section and therefore approves the change.

Section 6.9.1.10 Reporting Requirements for Incident Which Occurred on March 28, 1979 - Presently Section 6.9.1.10 requires that a written quarterly update/status report of the incident that occurred on March 28, 1979 and related events that occurred through January 15, 1980 be submitted to the Director of the Regional Office, NRC.

These reports were to be submitted until a final report was issued containing certain required information. This final report was issued on May 11, 1981, satisfying the requirements of the Specification. Therefore the staff agrees with the proposed change.

Section 6.10 Record Retention - Section 6.10.2.f has been changed to state specific reports required to be maintained instead of referencing the Specification that requires them. The Specifications are 6.9.1.6 (the Radiation Safety Program Reports) and 6.9.1.10 (Quarterly Recovery Progress Reports on the March 28, 1979 Incident). As discussed above, both specifications are being deleted.

The proposed changes clarify the reference to specific reports without modifying the retention requirements. Therefore the staff finds this change acceptable.

Section 6.10.2.i - The licensee has requested that the additional requirements be included in the referenced section so that Technical Evaluation Reports, System Descriptions, and Safety Evaluations be retained.

The staff finds the proposed change acceptable.

Section 6.10.2.j - This change adds the Safety Review Group's reports to those required to be retained. Based on previous discussions of the SRG the staff finds this change acceptable.

Environmental Considerations

We have determined that the change does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the change involves an action which is insignificant from the standpoint of environmental impact and, pursuant to 10 CFR 51.5 (d)(4), than an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this change.

Conclusion

Based upon our review of the above discussed changes as modified, the staff finds that the requested revision of the proposed Technical Specifications is acceptable.

We have also 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.

Discussion of Organization Plan Change No. 6

The subject change request dated November 29, 1982 with subsequent amendments dated February 11, 1983 and February 22, 1983, proposed the replacement of the Plant Operations Review Committee (PORC) with the Safety Review Group (SRG). Also a note has been added to Figure 1.2 that describes the responsibility of the Manager, SRG, should inadequate consideration be given by the Licensing and Nuclear Safety Director to nuclear and radiological safety issues. The staff has also indicated this by a dotted line to the Office of the President - GPU Nuclear Corporation.

Wording changes in sections 1.0, 1.1, 2.1.3 and 2.2 have also been made to support the above discussed changes in the Amendment of Order which is being issued concurrently.

The staff agrees with the subject changes which should be implemented by November 1, 1983.

Discussion of Revision 7 to the Organization Plan

We have reviewed the proposed revision No. 7 to the TMI-2 Organization Plan as discussed in your letter dated June 14, 1983 (4410-38-L-0114). The proposed revision would realign the functions reporting to the Manager, Recovery Programs, by deleting the Reactor Disassembly and Defueling Operations section as a separate group and making it a subsection of the Recovery Operations section. The staff interprets this as an administrative change that is proposed to improve the operational effectiveness of the TMI-2 organization.

Since these revisions to the TMI-2 Organization Plan will not cause any loss of function under the current requirements of Section 6 of the proposed Appendix A Technical Specifications to occur, we approve the requested change to be implemented by November 1, 1983.

REFERENCES

- 1) Arnold to Snyder, Technical Specification Change Request No. 40, November 29, 1982, 4410-82-L-0013
- 2) Arnold to Snyder, Amendment 1 to Technical Specification Change Request No. 40, February 25, 1983, 4410-83-L-0023
- 3) Kanga to Snyder, Organization Plan Change Request No. 6; November 29, 1982; Amendment 1, February 11, 1983; Amendment 2, February 22, 1983
- 4) Kanga to Snyder, Organization Plan Change Request No. 7, June 14, 1983

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following pages of Appendix "A" Proposed Technical Specifications with the enclosed pages as indicated. The revised pages contain vertical lines indicating the area of change.

1-3
6-1
6-3
6-4
6-5
6-6
6-7
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6-13
6-14
6-15

Replace the following pages of the TMI-2 Organization Plan with the enclosed pages as indicated.

Page 1
Figure 1.1
Figure 1.2

DEFINITIONS

CHANNEL FUNCTIONAL TEST

1.10 A CHANNEL FUNCTIONAL TEST shall be:

- a. Analog channels - the injection of a simulated signal into the channel as close to the primary sensor as practicable to verify OPERABILITY including alarm and/or trip functions.
- b. Bistable channels - the injection of a simulated signal into the channel sensor to verify OPERABILITY including alarm and/or trip functions.

STAGGERED TEST BASIS

1.11 A STAGGERED TEST BASIS shall consist of:

- a. A test schedule for n systems, subsystems, trains or designated components obtained by dividing the specified test interval into n equal subintervals,
- b. The testing of one system, subsystem, train or designated components at the beginning of each subinterval.

FREQUENCY NOTATION

1.12 The FREQUENCY NOTATION specified for the performance of Surveillance Requirements shall correspond to the intervals defined in Table 1.2.

FIRE SUPPRESSION WATER SYSTEM

1.13 A FIRE SUPPRESSION WATER SYSTEM shall consist of: a water source; gravity tank or pumps; and distribution piping and associated sectionalizing control or isolation valves. Such valves shall include yard hydrant curb valves, and the first valve upstream of the water flow alarm device on each sprinkler, hose standpipe or spray system riser.

REVIEW SIGNIFICANCE

1.14 Items that are Important to Safety, or proposed changes to Technical Specifications, License, Special Orders or Agreements, Recovery Operations Plan, Organization Plan, or involve an Unreviewed Safety Question or a Significant Environmental Impact. Also, those system operating procedures and associated emergency, abnormal, alarm response procedures which require NRC approval. In addition, those activities which exceed PEIS values.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Office of the Director-TMI-2 consists of the Director-TMI-2 and the Deputy Director-TMI-2 and shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during both of their absences.

6.2 ORGANIZATION

GPUNC ORGANIZATION

6.2.1 The GPU Nuclear Corporation (GPUNC) Organization for unit management and technical support shall be as shown on Figure 1-1 of the Organization Plan. The Organization Plan and changes thereto shall be approved by the NRC prior to implementation.

TMI-2 ORGANIZATION

6.2.2 The unit organization shall be shown on Figure 1-2 of the Organization Plan and:

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Operator shall be in the control room when fuel is in the reactor.
- c. An individual qualified in radiation protection procedures shall be on site when fuel is in the reactor.
- d. A Site Fire Brigade of at least 5 members shall be maintained onsite at all times. The Site Fire Brigade shall not include 3 members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- e. An individual qualified in radiation protection procedures shall be on site whenever Radioactive Waste Management activities are in progress.

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.

6.3.2 The Radiological Controls Director TMI-2 or his deputy 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 direction of the Plant Training Manager-TMI-2 and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977 and 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-TMI-2 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.

Divisions other than the TMI-2 Division will perform the Independent Safety Review of their own procedures affecting TMI-2 in accordance with approved procedures except when they impact the operational status of unit systems or equipment (requires TMI-2 Division concurrence), a significant environmental impact (requires in line SRG and Environmental Licensing review), or represent an Unreviewed Safety Question (USQ) or Tech Spec change, including Recovery Operations Plan Change (requires in line SRG review and NRC approval).

ADMINISTRATIVE CONTROLS

ACTIVITIES

6.5.1.1 Each procedure required by Technical Specification 6.8 and other procedures including those for test and experiments and changes thereto shall be prepared by a designated individual(s)/group knowledgeable in the area affected by the procedure. Each such procedure, and changes thereto, shall be given a technical review by an individuals(s)/group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change.

6.5.1.2 Proposed changes to the Technical Specifications shall be reviewed by a knowledgeable individual(s)/group other than the individual(s) group who prepared the change, and the SRG.

6.5.1.3 Proposed modifications to unit structures, systems and components shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be technically reviewed by an individual/group other than the individual/group which designed the modification but may be from the same group as the individual who designed the modification.

6.5.1.4 Proposed tests and experiments shall be reviewed by a knowledgeable individual(s)/group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments.

6.5.1.5 The Security Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.

6.5.1.6 The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.

6.5.1.7 The Recovery Operations Plan and implementing procedures and changes thereto shall be reviewed by a knowledgeable individual/group other than the individual/group which prepared them.

6.5.1.8 Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.7 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel.

6.5.1.9 Support Division procedures will be reviewed and approved in accordance with their Division level procedures. If the procedure/change impacts the operational status of unit systems or equipment, it must be concurred with by the TMI-2 Division. Unreviewed Safety Question, Technical Specification change (including Recovery Operations Plan change), or Significant Environmental Impact requires line TMI-2 Division and SRG review prior to implementation.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.1.10 Written records of activities performed under specifications 6.5.1.1 through 6.5.1.8 shall be maintained in accordance with 6.10.

QUALIFICATIONS

6.5.1.11 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS-3.1 - 1978 Section 4.4 for Reactor Engineering, Instrumentation and Control, Chemistry and Radiochemistry, Radiation Protection and Quality Assurance Reviewers or have seven (7) years of appropriate experience in the area of their specialty. All other RTRs shall meet Section 4.6, i.e., shall either, (1) have a Bachelor's Degree in Engineering or the physical sciences and three years of professional-level experience in the area being reviewed or, (2) have seven years of appropriate experience in the field of their specialty. 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.

6.5.2 INDEPENDENT SAFETY REVIEW

FUNCTION

6.5.2.1 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 Independent Safety Review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility.

Divisions other than the TMI-2 Division will perform the Independent Safety Review of their own procedures affecting TMI-2 in accordance with approved procedures except when they impact the operational status of unit systems or equipment (requires TMI-2 Division concurrence), a significant environmental impact (requires in line SRG and Environmental Licensing review), or represent and Unreviewed Safety Question (USQ) or Tech. Spec. change, including Recovery Operations Plan Change (requires in line SRG review and NRC approval).

When the Preparer determines a procedure is not Review Significant, the signature of the RTR indicates concurrence with this determination.

6.5.2.2 Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work. For those TMI-2 Division documents determined to be Review Significant, the Independent Safety Review shall be performed by or under the cognizance of SRG.

ADMINISTRATIVE CONTROLS

6.5.2.3 GPU Nuclear Corporation shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

- a. Nuclear unit operations
- b. Nuclear engineering
- c. Chemistry and radiochemistry
- d. Metallurgy
- e. Instrumentation and control
- f. Radiological safety
- g. Mechanical engineering
- h. Electrical engineering
- i. Administrative controls and quality assurance practices
- j. Emergency plans and related organization, procedures and equipment
- k. Other appropriate fields such as radioactive waste operation associated with the unique characteristics of TMI-2.

6.5.2.4 Consultants may be utilized to provided expert advice.

RESPONSIBILITIES

6.5.2.5 The following subjects shall be independently reviewed:

- a. Written safety evaluations of changes in the facility as described in the Safety Analysis Report, Technical Evaluation Reports, or docketed System Descriptions, of changes in procedures as described in the Safety Analysis Report, Technical Evaluation Reports, or docketed System Descriptions, and of tests or experiments not described in the Safety Analysis Report, Technical Evaluation Reports, or docketed System Descriptions, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review of items determined not to be Review Significant when performed by SRG is a supplemental review to verify that such changes, tests or experiments did not involve a change in the Technical Specifications or an Unreviewed Safety Question.
- b. Proposed changes in procedures, proposed changes to the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an Unreviewed Safety Question shall be reviewed by SRG prior to implementation. Changes to Review Significant procedures which revision is not deemed to be Review Significant shall not be required to be reviewed by SRG prior to implementation.
- c. Proposed changes to Technical Specifications or license amendments shall be reviewed by SRG prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require 24 hour reporting to the NRC in writing. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations

ADMINISTRATIVE CONTROLS

resulting from such investigations to prevent or reduce the probability of recurrence of the event. SRG shall review all 24 hour reportable events and make recommendations as appropriate.

- e. Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, shall be reviewed by TMI-2 SRG.
- f. 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 shall be performed by TMI-2 SRG.
- 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 deems appropriate for consideration, or which is referred to the SRG.

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.

RECORDS

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

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. The conformance of unit operations to provisions contained within the Technical Specifications and applicable license conditions at least once per 12 months.
- b. The performance, training and qualifications of the entire unit staff at least once per 12 months.
- c. 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 at least once per 6 months.

ADMINISTRATIVE CONTROLS

- d. The performance of activities required by the Recovery Quality Assurance Plan to meet the criteria of Appendix "B", 10 CFR 50, at least once per 24 months.
- e. The Emergency Plan and implementing procedures at least once per 12 months.
- f. The Security Plan and implementing procedures at least once per 12 months.
- g. The Radiation Protection Plan and implementing procedures at least once per 12 months.
- h. The Fire Protection Program and implementing procedures at least once per 24 months.
- i. 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. 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. Any other area of unit operation considered appropriate by the SRG, the Manager, SRG's immediate supervisor, 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 4.3.1 shall be forwarded for action to the management positions responsible for the areas audited and SRG within 60 days after completion of the audit. SRG 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 of Engineering staff, and located onsite within the TMI-2 division. (See Organization Plan Figure 1.2.)

ORGANIZATION

6.5.4.2 The TMI-2 SRG shall consist of the Manager, SRG and a minimum staff of 5 engineers.

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The SRG shall report within the TMI-2 Division independent of the unit operations and engineering functions, but no lower in the organization than one level below the Office of the Director TMI-2.

RESPONSIBILITY

6.5.4.3 The Manager, SRG is advisory to the Office of the Director TMI-2. However, he has the authority and responsibility to bring to the attention of the Office of the President GPUNC any issues he believes are not being addressed with adequate consideration of nuclear or radiological safety.

6.5.4.4 The review functions of the SRG shall include:

- (1) the independent safety review activities stated in Section 6.5.2.5.
- (2) assessment of unit operations and performance and unit safety programs from a nuclear safety perspective.
- (3) any other matter involving safe nuclear operations at the nuclear power plant that the Manager, SRG, the Manager, SRG's immediate supervisor, or other managers reporting directly to the Office of the Director TMI-2 deem appropriate for consideration.

6.5.4.5 For those reviews requiring expertise outside that possessed by SRG, SRG is authorized to require reviews by other company groups as deemed appropriate by the Manager, SRG. SRG may also utilize consultant expertise as it deems appropriate.

Authority

6.5.4.6 The SRG shall have access to the unit and unit records as necessary to perform its evaluations and assessments. Based on its reviews, the SRG shall provide recommendations to the management positions responsible for the areas reviewed. The SRG shall have authority to require independent reviews by other organizations as necessary to complete its functional responsibilities. The Manager, SRG is advisory to the Office of the Director TMI-2. However, he has the authority and responsibility to bring to the attention of the Office of the President any issues he believes are not being addressed with adequate consideration of nuclear or radiological safety.

QUALIFICATIONS

6.5.4.7 The SRG engineers shall have either; (1) a Bachelor's Degree in Engineering or the Physical Sciences and five (5) years of professional level experience in the nuclear power field including technical supporting functions, or, (2) 9 years of appropriate experience. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years. The Manager, SRG, shall meet or exceed the requirements of section 4.7 of ANSI/ANS 3.1-1978.

ADMINISTRATIVE CONTROLS

RECORDS

6.5.4.8 Although day to day results of evaluations by the SRG are communicated directly to the responsible department by the SRG, special reports are prepared only for items deemed appropriate by SRG as concurred with by the Manager, SRG's immediate supervisor. These special reports of evaluations and assessments by SRG shall be prepared, approved, and then transmitted to the Office of the Director, TMI-2 and the management position responsible for the area reviewed through the Manager, SRG's immediate supervisor. These reports shall be maintained for the life of the operating license.

6.6 REPORTABLE OCCURRENCE ACTION

6.6.1 The following actions shall be taken for REPORTABLE OCCURRENCES:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Specification 6.9.
- b. Each REPORTABLE OCCURRENCE requiring 24 hour notification to the Commission shall be reviewed by the SRG and a report submitted to the Manager, SRG's immediate supervisor and the Office of the Director TMI-2.
- c. Deleted.

6.7 SECTION DELETED

6.8 PROCEDURES

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Recovery Operations Plan implementation.
- c. Surveillance and test activities of safety-related equipment and radioactive waste management equipment.
- d. Security Plan implementation.
- e. Emergency Plan implementation.
- f. Radiation Protection Plan implementation.
- g. Limiting the amount of overtime worked by plant staff members performing safety-related functions in accordance with the NRC policy statement on working hours as transmitted by Generic Letter 82-12.

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:

- a. Directly relate to core cooling, or
- b. Could cause the magnitude of radiological releases to exceed limits established by the NRC, or
- c. Could increase the likelihood of failures in systems important to nuclear safety and radioactive waste processing or storage, or
- d. Alter the distribution or processing of significant quantities of stored radioactivity or radioactivity being released through known flow paths.

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 if:

- 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 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, this signature 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 Administrator unless otherwise noted.

ADMINISTRATIVE CONTROLS

ANNUAL REPORTS^{1/}

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 inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions.
- b. The following information on aircraft movements at the Harrisburg International Airport:
 1. The total number of aircraft movements (takeoffs and landings) at the Harrisburg International Airport for the previous twelve-month period.
 2. The total number of movements of aircraft larger than 200,000 pounds, based on a current percentage estimate provided by the airport manager or his designee.

RADIATION SAFETY PROGRAM REPORT

6.9.1.6 Deleted.

REPORTABLE OCCURRENCES

6.9.1.7 The REPORTABLE OCCURRENCES of Specifications 6.9.1.8 and 6.9.1.9, including corrective actions and measures to prevent recurrence, shall be reported to the NRC. Supplemental reports may be required to fully describe final resolution of occurrence. In case of corrected or supplemental reports, a licensee event report shall be completed and reference shall be made to the original report date.

^{1/} A 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.

^{2/} This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

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PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.8 The types of events listed below shall be reported within 24 hours by telephone and confirmed by telegraph, mailgram, or facsimile transmission to the NRC Region Administrator or his designate no later than the first working day following the event, with a written followup report within 30 days. The written followup report shall include, as a minimum, a completed copy of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Deleted.
- b. Operation of the unit or affected systems when any parameter or operation subject to a limiting condition for operation is less conservative than the least conservative aspect of the limiting condition for operation established in the Technical Specifications.
- c. Abnormal degradation discovered in reactor coolant pressure boundary, or primary containment.
- d. An unplanned reactivity insertion of more than 0.5% delta K/K or occurrence of any unplanned criticality.
- e. Failure or malfunction of one or more components which prevents or could prevent, by itself, the fulfillment of the functional requirements of system(s) used to cope with accidents analyzed in the SAR, TER, or Safety Evaluation previously submitted to NRC.
- f. Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR, TER, or Safety Evaluation previously submitted to NRC.
- g. Conditions arising from natural or man-made events that, as a direct result of the event, require operation of safety systems or other protective measures required by Technical Specifications.
- h. Performance of structures, systems, or components that requires remedial action or corrective measures to prevent operation in a manner less conservative than assumed in the accident analyses in the safety analysis report or Technical Specifications bases; TER, or Safety Evaluation previously submitted to NRC or discovery during unit life of conditions not specifically considered in the safety analysis report or Technical Specifications that require remedial action or corrective measures to prevent the existence or development of an unsafe condition.

THIRTY DAY WRITTEN REPORTS

6.9.1.9 The types of events listed below shall be the subject of written reports to the NRC Region Administrator within thirty days of occurrence of the event. The written report shall include, as a minimum, a completed copy

ADMINISTRATIVE CONTROLS

of a licensee event report form. Information provided on the licensee event report form shall be supplemented, as needed, by additional narrative material to provide complete explanation of the circumstances surrounding the event.

- a. Reactor protection system or engineered safety feature instrument settings which are found to be less conservative than those established by the Technical Specifications but which do not prevent the fulfillment of the functional requirements of affected systems.
- b. Conditions leading to operation in a degraded mode permitted by a limiting condition for operation.
- c. Observed inadequacies in the implementation of administrative or procedural controls which threaten to cause reduction of degree of redundancy provided in engineered safety feature systems or radioactive waste treatment systems.
- d. Abnormal degradation of systems other than those specified in 6.9.1.8.c above designed to contain radioactive material resulting from the fission process.
- e. All events which require activation of the Emergency Plan.

REPORTING REQUIREMENTS FOR INCIDENT WHICH OCCURRED ON MARCH 28, 1979

6.9.1.10 Section Deleted. All reporting requirements completed.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted to the NRC Region Administrator within the time period specified for each report.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records of sealed source and fission detector leak tests and results.
- b. Records of annual physical inventory of all sealed source material of record.
- c. Records of changes made to the procedures required by Specifications 6.8.1.d and e.

6.10.2 The following records shall be retained as long as the Licensee has an NRC license to operate or possess the Three Mile Island facility.

- a. Records and logs of unit operation covering time interval at each power level.

ADMINISTRATIVE CONTROLS

- b. Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to nuclear safety and radioactive waste systems.
- c. ALL REPORTABLE OCCURRENCES submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specifications 6.8.1.a, b., c., and f.
- f. Radiation Safety Program Reports and Quarterly Recovery Progress Reports on the March 28, 1979 incident.
- g. Records of radioactive shipments.
- h. Records and logs of radioactive waste systems operations.
- i. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Safety Analysis Report, TER, SD, or Safety Evaluation previously submitted to NRC.
- j. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- k. Records of transient or operational cycles for those unit components designed for a limited number of transients or cycles.
- l. Records of reactor tests and experiments.
- m. Records of training and qualification for current members of the unit staff.
- n. Records of in-service inspections performed pursuant to these Technical Specifications.
- o. Records of Quality Assurance activities required by the Operating Quality Assurance Plan.
- p. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- q. Records of meetings of the Plant Operation Review Committee (PORC) and the General Review Committee (GRC) and reports of evaluations prepared by the SRG.

ORGANIZATION PLAN

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MI-2
i

ORGANIZATION PLAN - TMI-2

1.0 ORGANIZATION

The organization described in this Plan provides the necessary functional relationships to support the recovery of TMI-2. This Plan provides the organizational structure for management of unit operation and recovery in addition to that organization for unit support in the engineering function.

1.1 GPU Nuclear Corporation

The GPU Nuclear Corporation organization chart is shown in Figure 1.1. This organization provides engineering and management support for the operation and recovery of TMI-2.

1.2 TMI-2 Organization

The TMI-2 organization chart is shown in Figure 1.2. This organization performs those necessary activities associated with operations, maintenance, and recovery of TMI-2 in addition to engineering, licensing, and safety review and evaluation.

2.0 ADMINISTRATION

2.1 Plan Approval and Audit

- 2.1.1 The docketed TMI-2 Organization Plan and changes thereto shall be approved by the Office of the President, GPU Nuclear Corporation.
- 2.1.2 Changes to the docketed Organization Plan shall be submitted to the NRC for approval prior to implementation.
- 2.1.3 The QA Department shall conduct annual audits to verify conformance of the organization with the Organization Plan. SRG shall review the results of such audits and make recommendations as appropriate.

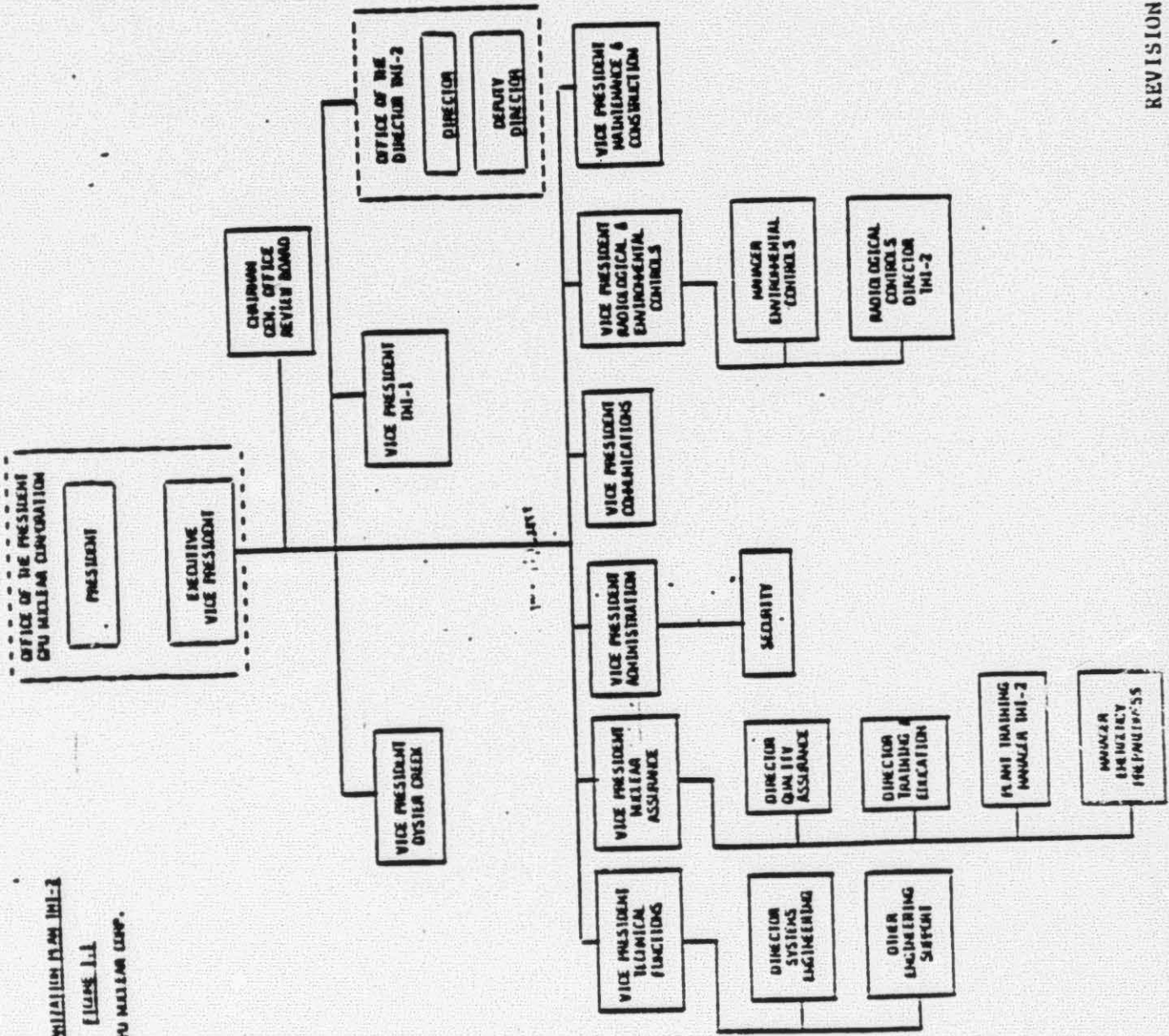
2.2 Technical Specification Title Cross-Reference

This section has been deleted. The TMI-2 Recovery Technical Specifications have been revised to properly reflect GPUNC individual titles.

ORGANIZATION PLAN INI-3

FIGURE 1.1

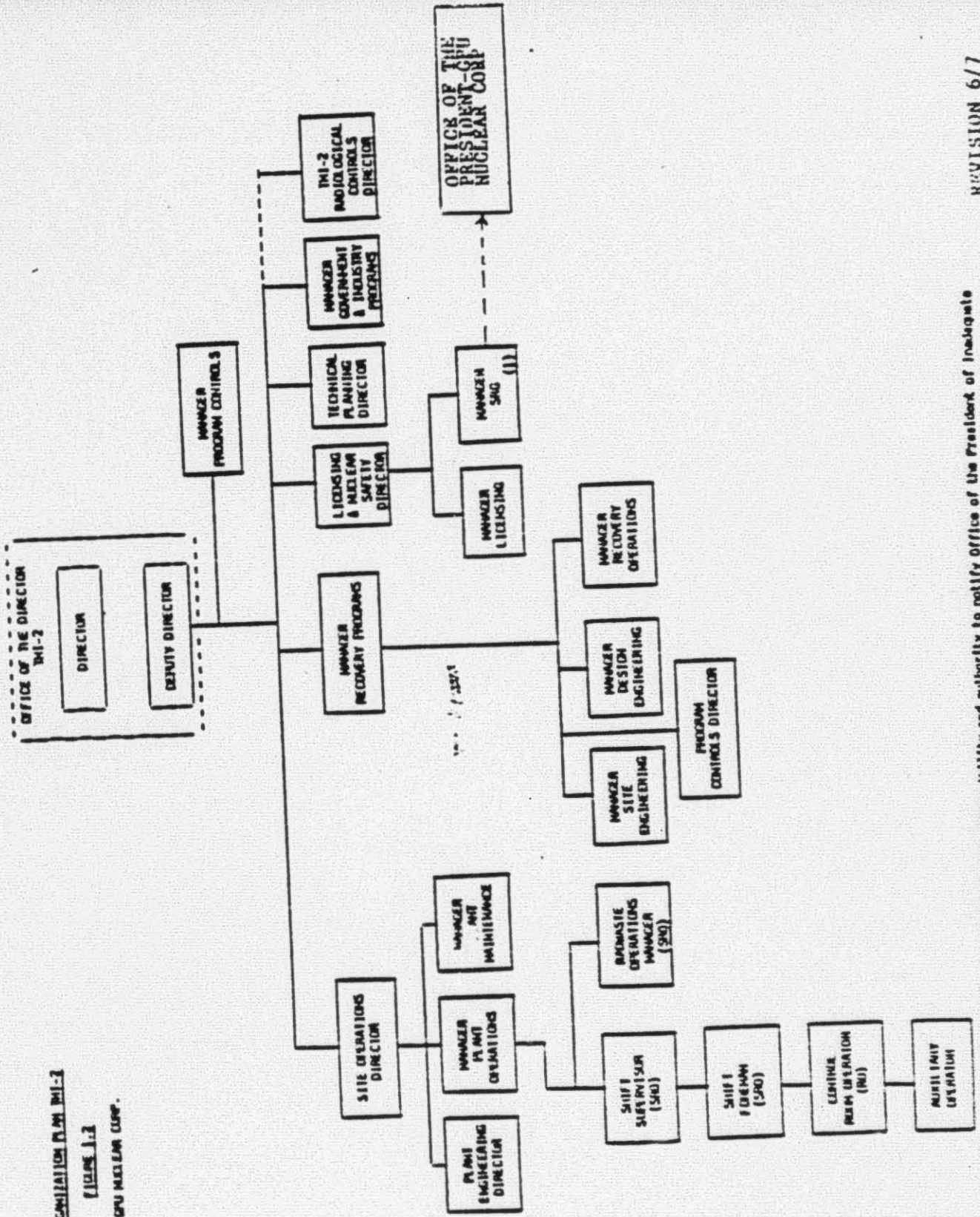
GPU NUCLEAR CORP.



ORGANIZATION PLAN IMI-2

FIGURE 1.1.2

GPU NUCLEAR CORP.



(1) Advisory to office of the Director IMI-2 with responsibility and authority to notify Office of the President of inadequate consideration of nuclear and radiological safety issues.