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

October 18, 1985

Docket No. 50-320

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

Dear Mr. Standerfer:

Subject: Three Mile Island Nuclear Station, Unit 2
Operating License No. DPR-73
Docket No. 50-320
Technical Specification Change Requests No. 48 and 50

The Nuclear Regulatory Commission has issued the enclosed Amendment of Order in response to your April 12, 1985 and June 18, 1985 requests to modify sections of the Appendix A Proposed Technical Specifications (PTS). Our review of the Recovery Operations Plan Changes requested by these two letters is presented in separate concurrently issued correspondence. Our review of the Appendix B change, requested in the April 12, 1985 letter, will be issued in separate correspondence.

Your April 12, 1985 letter requested changes to the Appendix A PTS to conform with the requirements contained in the NRC Generic Letter 83-43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and the Standard Technical Specifications." Other changes requested delete requirements for equipment and monitoring that are no longer needed and propose editorial changes to improve clarity. You also requested that reference to the Programmatic Environmental Impact Statement (PEIS) be dropped from the definition of "review significant"; under the current definition, you are required to make a determination as to whether documents implementing the cleanup are bounded by the PEIS. Your June 18, 1985 letter also requested a number of administrative changes to correct or clarify the PTS.

The staff has reviewed the safety evaluations in your April 12, 1985 and June 18, 1985 letters and has concluded, with the exception noted below, that your requests are acceptable with minor changes as discussed with your staff. We have determined that it is not appropriate to delete the PEIS as a document used to determine review significance; however, for those activities that are clearly within the scope of an NRC approved system description, SER or TER, no additional comparison to PEIS values is required. The text of the definition for "review significant" has been

changed accordingly.

Since the February 11, 1980 Order imposing the PTS 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 to the Proposed Technical Specifications in Accordance Therewith.

A Federal Register Notice for the subject issuance is enclosed. Copies of the related Safety Evaluation and revised pages for the PTS are also enclosed.

Sincerely,

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 Specifications Page Changes
4. Federal Register Notice

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Enclosure 1

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

In the Matter of	)	
GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION	)	Docket No. 50-320
(Three Mile Island Nuclear Station, Unit 2)	)	

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.

II.

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 shut-down 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 Recovery Mode Proposed Technical Specifications (PTS) presently pending before the Atomic Safety and Licensing Board. The revisions that are the subject of this order do not give the licensee authorizations that may be needed to undertake specific cleanup activities. Hereafter in this Amendment of Order, the requirements in question are identified by the applicable Proposed Technical Specification.

III.

By letters dated April 12, 1985 and June 18, 1985, GPU Nuclear Corporation (GPUNC) requested that the PTS be modified. The requests consisted of changes to the PTS to conform with the requirements contained in the NRC Generic Letter 83-43, Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and the Standard Technical Specifications. Other changes requested by the licensee deleted requirements for equipment and monitoring that are no longer needed and proposed administrative and editorial changes to improve clarity. The licensee also requested that reference to the Programmatic Environmental Impact Statement be dropped from the definition of "review significant" as defined in PTS 1.14. The licensee is currently required to make a determination as to whether or not documents implementing the cleanup or submitted to the NRC are bounded by the PEIS. In particular, the licensee has proposed changes to PTS 1.6, 3.0.3, 3.3.3.8, 3.4.2, 3.7.10.1, 3.7.10.2, 3.7.10.3, 6.5.2.5(d) and (e), 6.6, 6.9, 6.9.1.7, 6.9.1.8, 6.9.1.9, and 6.10.2(c), to conform to the provisions

of 10 CFR §50.72 or 50.73, as appropriate; to PTS 1.14, 3.4.9.1, 6.5.2.3, 6.5.2.5.a, 6.5.3.1, 6.9.1, and 6.9.2, to correct typographical errors or to clarify existing provisions or otherwise achieve consistency, without affecting the substance of the existing requirements; and to PTS 3.6.4 and 3.7.10.2, to delete requirements which are no longer necessary given the current status of the plant.

After reviewing the licensee's safety evaluations in the April 12, 1985 and June 18, 1985 letters and performing its own safety evaluation, the staff has concluded, with the exception noted below, that the requested changes are acceptable and has modified the appropriate sections of the PTS. The staff has determined that it is not appropriate to delete the PEIS as a document used to determine review significance; however, for those activities that are clearly within the scope of an NRC approved system description, SER or TER, no additional comparison to PEIS values is required. The text of the definition for "review significant" has been changed accordingly.

The staff's safety assessment of this matter as discussed above is set forth in the concurrently issued Safety Evaluation. 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 Herewith.

This action involves changes to requirements with respect to the installation or use of a facility component located within the restricted area, as well as changes in recordkeeping, reporting or administrative procedures or requirements. The staff has determined that this action involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite and that there is no significant increase in individual or cumulative occupational radiation exposure. Accordingly, this action meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (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 action.

IV.

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 Enclosure 3 hereto. This Amendment of Order shall be effective on November 22, 1985.

For further details with respect to this action, see (1) Letter to B. J. Snyder, USNRC, from F. R. Standerfer, GPUNC, Technical Specification Change Request 48 and Recovery Operations Plan Change Request 29, dated April 12, 1985, (2) Letter to B. J. Snyder, USNRC, from F. R. Standerfer, GPUNC, Technical Specification Change Request No. 50 and Recovery Operations Plan Change Request No. 32, dated June 18, 1985, and (3) the Director's Order of February 11, 1980.

All the above documents are available for inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, DC 20555, 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

Darrell G. Eisenhut, Deputy Director
Office of Nuclear Reactor Regulation

Effective Date: November 22, 1985
Dated at Bethesda, Maryland
Issuance Date: October 18, 1985

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

GPU NUCLEAR CORPORATION

METROPOLITAN EDISON COMPANY

PENNSYLVANIA ELECTRIC COMPANY

JERSEY CENTRAL POWER AND LIGHT COMPANY

DOCKET NO. 50-320

THREE MILE ISLAND NUCLEAR STATION UNIT NO. 2

INTRODUCTION

By letters dated April 12, 1985 and June 18, 1985, GPU Nuclear Corporation (GPUNC) requested the approval of changes to Appendix A Proposed Technical Specifications (PTS) and the Recovery Operations Plan (ROP) of Operating License No. DPR-73 and provided supporting information for the proposed modifications. GPUNC further requested in the April 12, 1985 letter to change the Appendix B Technical Specifications. Our review of the ROP changes is presented in separate concurrently issued correspondence. Our review of the Appendix B change will be issued in separate correspondence. The Appendix A PTS changes were requested by the licensee to update the PTS to reflect current plant conditions and conform to current regulatory requirements.

DISCUSSION

The licensee has requested changes to PTS to conform with the requirements contained in the NRC Generic Letter 83-43, "Reporting Requirements of 10 CFR Part 50, Sections 50.72 and 50.73, and the Standard Technical Specifications." Other changes requested by the licensee delete

requirements for equipment and monitoring that are no longer needed and propose administrative and editorial changes to improve clarity. The licensee also requested that the values contained in the Programmatic Environmental Impact Statement (PEIS) should no longer serve as a trigger to require Safety Review Group (SRG) review and approval.

Since there are substantial changes to the PTS, a brief description and evaluation of each individual section follows:

Section 1.6

The licensee proposes that the definition for a REPORTABLE OCCURRENCE be replaced with the term REPORTABLE EVENT along with its appropriate definition. This is in accordance with 10 CFR Section 50.73 which became effective January 1, 1984. We find this change acceptable.

Section 1.14

The licensee proposed in their April 12, 1985 letter to modify the definition of REVIEW SIGNIFICANT by dropping the last sentence which would delete the PEIS as a document the licensee must consult and determine if the action planned is within the scope of the limits set forth by the PEIS. The licensee does not propose any substitute wording. Reference to the PEIS was added to this definition in PTS Change 40, dated September 19, 1983 at the request of the licensee. A recent Performance Appraisal Inspection dated May 15, 1984 (Inspection Report 50-320/84-08) found (Section 4.d., page 14) that TMI-2 personnel had a poor understanding of how the PEIS values applied to specific work activities. The licensee

argues that consulting the PEIS is unnecessarily burdensome particularly with regard to the preparation and approval of detailed procedures. The staff has reviewed the use of the term REVIEW SIGNIFICANT in the applicable subsections of Section 6 of the Proposed Technical Specifications. The staff finds that the phrase REVIEW SIGNIFICANT does not apply only to detailed procedures but all documents including SER's and TER's. The PEIS is the bounding document prepared by the NRC which assesses impacts to the environment based on anticipated actions on the part of the licensee. The licensee has the responsibility to be aware of the limits in the PEIS and to be alert to any activities that may result in impacts other than those predicted by the PEIS. The staff, however, recognizes that detailed procedures prepared by the licensee are usually bounded by a system description, SER or TER, which is likewise prepared by the licensee. Generally that system description, SER or TER includes an assessment of whether the activity is within the scope of the PEIS and is subject to review and approval by the NRC. As part of its review, the NRC would similarly determine whether the impacts of the proposed activity are within the scope of the PEIS; if not, the PEIS would, to the extent required, be appropriately supplemented to address the new or significantly changed impacts. Therefore, detailed procedures bounded by the NRC approved system description, SER or TER which includes such assessment would not exceed values contained in the PEIS, as supplemented if necessary. There are, however, procedures prepared by the licensee that are not within the scope of an approved system description, SER or TER. For this category of procedures a comparison to the PEIS would still be necessary. The staff proposes to modify the definition of REVIEW SIGNIFICANT so that activities

not covered by an NRC approved system description, SER or TER would require comparison to the PEIS values. Detailed procedures within the scope of an approved system description, SER or TER would not require comparison to the PEIS. The licensee has agreed to the proposed wording which revises its request.

We have identified two typographical errors in this definition. The word "SIGNIFICANCE" in the title should be "SIGNIFICANT." Also, the word "item" in the first sentence should be "items." The attached change page reflects these changes.

Section 3.0.3

The licensee proposes; (1) to delete the requirement in the PTS to promptly notify the NRC site staff if a Limiting Condition for Operation and/or associated Action Requirements cannot be satisfied, and (2) to conform to the new requirement of Section 50.73 of 10 CFR Part 50 that requires the licensee to submit a Licensee Event Report within 30 days after discovery of the event. The staff agrees with the proposed change. Although formal prompt notification of the NRC site staff will not be required by the PTS, the licensee will include in their administrative procedures the requirement for notification of the NRC site staff when Limiting Conditions for Operation and/or Associated Action Requirements cannot be satisfied.

Section 3.3.3.5

The licensee identified a discrepancy in the action statement requirements for the Spent Fuel Pool (SFP) "A" and Fuel Transfer Canal (FTC) (Deep End) Water Level Monitoring Instrumentation. The NRC's Amendment of Order dated April 23, 1985, in part, added Proposed Technical Specifications 3.9.1, Spent Fuel Storage Pool "A" Water Level Monitoring and 3.9.3, Fuel Transfer Canal (Deep End) Water Level Monitoring. The action statements for PTS 3.9.1 and 3.9.3 require that if either of the two required water level monitoring instruments become inoperable, that instrument shall be restored to operable status within seven days. Concurrently with the April 23, 1985 Amendment of Order, the licensee requested and was granted a change in Table 4.3-7 of the Recovery Operations Plan. Surveillance requirements for the Spent Fuel Storage Pool "A" Water Level and Fuel Transfer Canal (deep end) Water Level Instrumentation were added to Table 4.3-7. Proposed Technical Specification 3.3.3.5, Essential Parameters Monitoring Instrumentation, requires restoration of any instrument listed in Table 4.3-7 to operable status within 72 hours. Thus, the action statements for Technical Specifications 3.3.3.5, 3.9.1 and 3.9.3 are inconsistent with respect to instrumentation operability requirements. The licensee requests that the action statement of Technical Specification 3.3.3.5 be revised with respect to these two instruments so as to be consistent with the action statements of Technical Specification 3.9.1 and 3.9.3. The operability requirements in Technical Specifications 3.9.1 and 3.9.3 represented the staff's position on this issue when originally analyzed in the NRC's Amendment of Order dated April 23, 1985; therefore, the staff concurs in the licensee's request.

Section 3.3.3.8

Section 3.3.3.8 specifies the minimum operable fire detection instrumentation needed for each fire detection zone listed in Table 4.3-11. The licensee proposes to delete the requirement contained in the ACTION statement of the specification to submit a Special Report pursuant to Specification 6.9.2, if the instruments cannot be restored to an operable status within 14 days. The current PTS requirement allows the licensee to submit the Special Report within 30 days of exceeding the 14 day limit. Section 50.73 of 10 CFR Part 50 now requires that the licensee submit a Licensee Event Report (LER) within 30 days when a Technical Specification Action Statement is exceeded. The staff accepts the proposed change. The LER format is much more specific relative to the information required for submittal and the amount of time allowed for NRC notification is the same.

The staff further amends PTS 3.3.3.8 by inserting the words "of the Recovery Operations Plan" after ". . . Table 4.3-11 . . . ." This provides clarity to the specification.

Section 3.4.2

Section 3.4.2 specifies the minimum number of operable independent reactor vessel water level monitoring instruments. The licensee proposes to delete the requirement contained in the ACTION statement of the specification to submit a Special Report pursuant to Specification 6.9.2 if the instruments cannot be restored to operable status within 24 hours. The current PTS requirement allows the licensee to submit the Special Report within 30 days

of exceeding the 24 hour limit. Section 50.73 of 10 CFR Part 50 now requires that the licensee submit a Licensee Event Report (LER) within 30 days when a Technical Specification Action Statement is exceeded. The staff accepts the proposed change. The LER format is much more specific relative to the information required for submittal and the amount of time allowed for NRC notification is the same.

Section 3.4.9

The licensee proposes to remove the asterisk and associated footnote to this Technical Specification. The footnote requires the licensee to disable the reactor coolant makeup pumps by racking out their electrical power supply circuit breakers. The purpose of this footnote was to prevent inadvertent startup of the makeup pumps during the period after the accident when the primary system was pressurized. Inadvertent startup of the makeup pumps could have resulted in unisolable leakage. The primary system is no longer pressurized; therefore, inadvertent startup of the makeup pumps would not result in overpressurization. The licensee requests that this footnote be removed since it no longer applies.

The staff agrees with the licensee that inadvertent startup of the primary system makeup pumps would not result in overpressurization; additionally, the possibility exists that operation of these pumps may result in an unplanned dilution of the primary coolant depending on the source of the makeup water. The licensee has informed the staff that there are no plans to make these pumps operable and their electrical power supply circuit

breakers will remain racked out. Furthermore, operation of this system would be immediately apparent due to the rise in water level above the Internal Indexing Fixture. Water level is checked hourly and a mass balance of the RCS is performed at least every 24 hours to identify discrepancies. Therefore, if there was any inadvertent dilution of the reactor coolant it would be identified considerably before an inadvertent recriticality was possible. Accordingly, the staff concurs in the licensee's proposed change.

Section 3.5.1

The licensee proposes to clarify Technical Specification 3.5.1 by adding the phrase "performing core alterations" to the specification. This phrase is added to be consistent with Table 6.2-1, Minimum Shift Crew Composition. Table 6.2-1 indicates that during CORE ALTERATIONS an additional Senior Licensed Operator (SOL) or an SOL limited to fuel handling will be stationed on the operating floor, in the command center or in the control room as specified by procedure. Technical Specification 3.5.1 requires that an additional SOL or SOL limited to fuel handling, notwithstanding location, will have direct communications with personnel in the Reactor Building. The specification does not state that this occurs while performing core alterations. The staff concurs in the addition of this phrase since the requirement is applicable only when core alteration activities are being performed.

The licensee also requests changing the action statement to reflect the requirements of the specification rather than Table 6.2-1. The staff concurs in this request since it clarifies the requirements and ties the action statement to the specification.

Section 3.6.4

The licensee proposes deleting the requirement for maintaining a gas partitioner in an operable condition. The purpose of the gas partitioner is to monitor the hydrogen concentration in the containment atmosphere. In the fall of 1982 the licensee measured the rate of hydrogen evolution in the primary system and determined that the rate was approximately 0.01 cu. ft./day. The principal source was the decomposition of hydrazine. The radiolytic decomposition of water was an insignificant gas generation source. The licensee also found that the rate of evolution of hydrogen was decreasing. Therefore, the 0.01 cu. ft./day rate was considered conservative. Given the 0.01 cu. ft./day rate of evolution, a containment base volume of 2.1×10^6 cu. ft., it would take approximately 2.3×10^4 years for the concentration to reach a level where ignition of the hydrogen/air mixture was possible. This assumes that there is no exchange between the containment volume and the outside atmosphere. Normally a volume equal to the containment volume is exchanged with the outside atmosphere approximately every two hours. A substantial increase in the hydrogen generation rate could only occur if there was recriticality concurrent with a temperature increase severe enough to cause zircaloy

cladding decomposition. The only probable cause of recriticality would be boron dilution which would be a slow enough process that any approach to recriticality could be detected and avoided.

The staff agrees with the licensee's analysis and has determined that the current rate of hydrogen evolution is inconsequential and there is no likely scenario that would result in a significant increase in this rate. Therefore, the staff approves the licensee's proposed change to the PTS eliminating the need for the operable gas partitioner.

Sections 3.7.10.1.a and 3.7.10.1.b

Section 3.7.10 requires that the fire suppression water system be operable by defining various acceptable alternative configurations of operable pumps and water supplies. Sections 3.7.10.a and 3.7.10.b are the ACTION statements for this specification. The licensee proposes to delete the requirement contained in both ACTION statements of this specification to submit a Special Report pursuant to Specification 6.9.2 if the pumps or the system cannot be restored to an operable status within specified periods of time. The current PTS requirement allowed the licensee to submit the Special Report within 30 days. Section 50.73 of 10 CFR Part 50 now requires that the licensee submit a Licensee Event Report (LER) within 30 days when a Technical Specification Action Statement is exceeded. The staff accepts the proposed change. The LER format is much more specific relative to the information required for submittal and the amount of time allowed for NRC notification is the same.

Although formal prompt notification of the NRC will not be required by the PTS in the Action Statement of 3.7.10.1, the licensee will include in their administrative procedures the requirement for prompt notification of the NRC site staff when the licensee is required to establish a backup Fire Suppression Water System.

Section 3.7.10.2

This limiting condition for operation requires an operable Deluge and/or Sprinkler System in a number of locations throughout the plant. These areas are listed in the specification section of the PTS. An operable fire suppression system is presently required in the areas of the condenser exhaust filters and the auxiliary building backup exhaust filter as well as in a number of other locations. These features were added as a consequence of alterations made to the plant after the accident and are not otherwise required by Commission regulations. The licensee proposes to delete the requirement for an operable fire suppression system from the locations containing the condenser exhaust filters and the auxiliary building backup exhaust filter. The reason given in their April 12, 1985 submittal was that the combustible charcoal is being removed from these filter banks. Presumably once the charcoal is removed there is no longer a fire hazard and therefore no need for an operable fire suppression system. The staff informed the licensee by telephone that once the licensee certified that the charcoal has been removed from the filter banks the staff would approve the proposed change. In a letter dated August 2, 1985 to B. Snyder,

TMIPO:NRR, from F. Standerfer, GPUNC, the licensee certified that the charcoal had been removed. The TMIPO onsite staff has verified that the charcoal has been physically removed from these locations.

Since the combustible material has been removed from these locations and there is no further need for an operable fire suppression system, the staff concurs in the licensee's proposed change. The condenser exhaust filters and the auxiliary building backup exhaust filter have been removed from the list of required locations for an operable fire suppression system in PTS 3.7.10.2. The remaining locations have been renumbered.

The licensee also proposed to delete from the ACTION statement of this specification the requirements to submit a Special Report pursuant to Specification 6.9.2, if the deluge and/or sprinkler system cannot be restored to an operable status within 14 days. The current PTS requirement allows the licensee to submit the Special Report within 30 days. Section 50.73 of 10 CFR Part 50 now requires that the licensee submit a LER within 30 days when a PTS action statement is exceeded.

The staff accepts the proposed change to conform to the current regulations. The LER format is much more specific relative to the information required for submittal and the amount of time for NRC notification is the same.

Section 3.7.10.3

Section 3.7.10.3 requires that the Halon system used to extinguish fires be operable with the Halon storage tanks having at least 95% of full charge weight and 90% of full charge pressure. The licensee proposes to delete the requirement contained in the ACTION statement of the specification to submit a Special Report, pursuant to Specification 6.9.2 if the Halon system cannot be restored to an operable status within 14 days. The current PTS requirement allows the licensee to submit the Special Report within 30 days of exceeding the 14 day limit. Section 50.73 of 10 CFR Part 50 now requires that the licensee submit a Licensee Event Report (LER) within 30 days when a Technical Specification Action Statement is exceeded. The staff accepts the proposed change. The LER format is much more specific relative to the information required for submittal, and the amount of time allowed for NRC notification is the same.

Section 3.9.1

The licensee requests the correction of a misspelling in the title of this Technical Specification. The word "spend" is corrected to "spent." The staff concurs in this change.

Section 4.0.2

The licensee proposes an administrative change to correct a discrepancy in specifying the number of consecutive tests allowed in a specified surveillance interval. The phrase "a total maximum combined interval for any 3

consecutive tests" is changed to read as follows: "a total maximum combined interval for any 4 consecutive tests." This change is required to be consistent with Basis 4.0.2 which correctly specifies 3 consecutive test intervals, hence 4 consecutive tests. The staff concurs in the proposed change.

Section 6.5.2.3

The licensee has proposed capitalizing the word "Unit" in item a. This is a purely administrative change and the staff concurs.

Section 6.5.2.5.a.

This section of the PTS lists subjects that shall be independently reviewed by the licensee. The licensee has proposed deleting the word "of" in two instances in the list of subjects requiring independent review. The purpose of the change in wording is to improve readability of the PTS. This is purely an editorial change and the staff concurs.

Section 6.5.2.5.d.

The licensee proposes to change the categories of reports requiring independent review by the SRG to be consistent with the current classification in Section 50.72 of 10 CFR Part 50. The current PTS require that all required 24 hour written reports to the NRC be reviewed by the SRG. Changes in Section 50.72 of 10 CFR Part 50 require either one or four hour reports to the NRC for certain categories of non-emergency events that formerly required a 24 hour written report. Section 50.72 of 10 CFR Part 50 states that the one or four hour reports are made to the NRC

Operations Center, using the Emergency Notification System or if the system is inoperative, by telephone. The proposed change allows conformance to the current regulations. The staff concurs with the proposed change.

Section 6.5.2.5.e.

In this section the licensee proposes to change the scope of investigations of the SRG from violations of the PTS to all reportable events as defined by Section 50.73 of 10 CFR Part 50. The staff concurs in this proposed change.

Section 6.5.3.1.a. through h.

The licensee has proposed changing the wording to improve the clarity of the PTS by specifically stating the audit frequency. This is purely an administrative change and the staff concurs.

Section 6.6.1

The proposed changes to this section affect conformance with Section 50.73 of 10 CFR Part 50. The term "REPORTABLE OCCURRENCES" is replaced with "REPORTABLE EVENTS" and the licensee requires that all REPORTABLE EVENTS be reviewed by the SRG. Since these changes are required to conform to current regulations the staff concurs in the changes.

Sections 6.8.3.1.b.(1) and 6.8.3.1.b(2)

The licensee has proposed changing the wording to improve the clarity of the PTS by specifically identifying the required signature authority. This is purely an administrative change and the staff concurs.

Section 6.9.1 and 6.9.2

The licensee has proposed identifying the specific Regional Administrator to whom reports will be submitted. Since this is an administrative change to improve the clarity of the PTS the staff concurs in the change.

Section 6.9.1.7

The licensee proposes to delete this section from the PTS. REPORTABLE OCCURRENCES has been supplemented by the term REPORTABLE EVENT by a change in Section 50.73 of 10 CFR Part 50. REPORTABLE EVENT has been added to Section 1 definitions. Since this proposed change provides conformance with current NRC regulations the staff concurs.

Sections 6.9.1.8 and 6.9.1.9

The licensee proposed to delete these sections entirely. Sections 50.73 of 10 CFR Part 50 set forth the requirements for NRC notification of reportable events. Section 6.6 of the PTS as amended by this order requires the licensee to conform to Section 50.73 of 10 CFR Part 50. The details of notifying and submitting reports are specified in 50.72 and 50.73. The purpose of this change is to affect conformance of the PTS to the current regulations as contained in 50.72 and 50.73 of 10 CFR Part 50. The staff concurs in these changes.

Section 6.10.2.c.

The licensee proposes to change the term REPORTABLE OCCURRENCES to REPORTABLE EVENTS to be in conformance with Section 50.73 of 10 CFR PART 50. The staff concurs in this change.

Enclosure 3

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

The following list of pages of the Appendix "A", Proposed Technical Specifications have been modified as a result of this Amendment of Order. Therefore, you should replace your present pages with those enclosed.

1-1	3.9-1
1-3	4.0-1
3.0-1	6-6
3.3-6	6-7
3.3-7	6-8
3.4-1	6-10
3.5-1	6-11
3.6-2	6-12
3.7-6	6-13
3.7-7	6-14
3.7-8	6-15
3.7-9	

1.0 DEFINITIONS

DEFINED TERMS

1.1 The DEFINED TERMS of this section appear in capitalized type and are applicable throughout these Technical Specifications.

RECOVERY OPERATIONS PLAN

1.2 The RECOVERY OPERATIONS PLAN shall define the surveillance requirements to be performed to ensure equipment operability as required by the Limiting Conditions for Operation. This plan, and changes thereto, shall be approved by the Commission prior to implementation.

RECOVERY MODE

1.3 The RECOVERY MODE shall correspond to a condition in which the reactor is subcritical with an average reactor coolant temperature of less than 200°F.

ACTION

1.4 ACTION shall be those additional requirements specified as corollary statements to each specification and shall be part of the specifications.

OPERABLE - OPERABILITY

1.5 A system, subsystem, train, component or device shall be OPERABLE or have OPERABILITY when it is capable of performing its specified function(s). Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, cooling or seal water, lubrication or other auxiliary equipment, that are required for the system, subsystem, train, component or device to perform its function(s), are also capable of performing their related support function(s).

REPORTABLE EVENT

1.6 A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 of 10 CFR Part 50.

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 SIGNIFICANT

1.14 REVIEW SIGNIFICANT items shall consist of 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 not covered by an NRC approved system description, SER or TER and which exceed PEIS values.

3 LIMITING CONDITIONS FOR OPERATION

3.0 APPLICABILITY

LIMITING CONDITIONS FOR OPERATION

3.0.1 Limiting Conditions for Operation and ACTION requirements shall be applicable during the RECOVERY MODE or other conditions specified for each specification.

3.0.2 Adherence to the requirements of the Limiting Condition for Operation and/or associated ACTION within the specified time interval shall constitute compliance with the specification. In the event the Limiting Condition for Operation is restored prior to expiration of the specified time interval, completion of the ACTION statement is not required.

3.0.3 In the event a Limiting Condition for Operation and/or associated ACTION requirements cannot be satisfied because of circumstances in excess of those addressed in the specification, initiate appropriate actions to rectify the problem to the extent possible under the circumstances, and take all other actions necessary to maintain the unit in a stable condition; and submit a report to the Commission pursuant to the requirements of Section 50.73 of 10 CFR Part 50.

ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION

3.3.3.5 The Essential Parameters Monitoring Instrumentation shall be OPERABLE in accordance with the requirements of Table 4.3-7 of the RECOVERY OPERATIONS PLAN.

APPLICABILITY: RECOVERY MODE.

ACTION:

a. With the exception of the Reactor Vessel Water Level Monitoring instrumentation, the Spent Fuel Storage Pool "A" Water Level monitoring instrumentation, and the Fuel Transfer Canal (Deep End) Water Level monitoring instrumentation, for instrumentation not in accordance with the requirements of Table 4.3-7 of the RECOVERY OPERATIONS PLAN, restore the inoperable instrument(s) to the requirements of Table 4.3-7 of the RECOVERY OPERATIONS PLAN within 72 hours.

b. The operability requirements for the Reactor Vessel Water Level monitoring instrumentation shall be as specified in specification 3.4.2.

c. The operability requirements for the Spent Fuel Storage Pool "A" Water Level Monitoring instrumentation shall be as specified in specification 3.9.1.

d. The operability requirements for the Fuel Transfer Canal (Deep End) Water Level monitoring instrumentation shall be as specified in specification 3.9.3.

POST-ACCIDENT INSTRUMENTATION

3.3.3.6 Deleted.

CHLORINE DETECTION SYSTEMS

3.3.3.7 Two chlorine detection systems, with their alarm/trip setpoints adjusted to actuate at a chlorine concentration of less than or equal to 5 ppm, shall be OPERABLE:

a. One at the air intake tunnel, and

b. One at the Control Room air supply duct.

APPLICABILITY: RECOVERY MODE.

ACTION:

With one or more chlorine detection systems inoperable, within 1 hour initiate and maintain operation of the Control Room Emergency Ventilation System in the recirculation mode of operation; restore the inoperable detection system to OPERABLE status within 30 days.

FIRE DETECTION

3.3.3.8 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 4.3-11 of the RECOVERY OPERATIONS PLAN shall be OPERABLE.

APPLICABILITY: RECOVERY MODE

ACTION:

With the number of OPERABLE fire detection instruments less than required by Table 4.3-11 of the RECOVERY OPERATIONS PLAN, insure that an alternate instrument with the same coverage is OPERABLE, or;

1. Within 1 hour, establish a fire watch patrol to inspect the zone with the inoperable instrument(s) at least once per hour, and

2. Restore the inoperable instrument(s) to OPERABLE status within 14 days.

3.4 REACTOR COOLANT SYSTEM

REACTOR COOLANT LOOPS

3.4.1 The Reactor Coolant System shall be operated in accordance with procedures approved pursuant to Specification 6.8.2.

APPLICABILITY: RECOVERY MODE.

ACTION:

None except as provided in Specification 3.0.3.

REACTOR VESSEL WATER LEVEL MONITORING

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

APPLICABILITY: RECOVERY MODE WITH THE RV HEAD REMOVED

ACTION

a. With only one reactor vessel level monitoring instrument OPERABLE, terminate all activities involving changes in the reactor coolant system water volume, restore the system to OPERABLE status within 72 hours.

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

SAFETY VALVES

3.4.3 Deleted.

3.4.9 PRESSURE/TEMPERATURE LIMITS

REACTOR COOLANT SYSTEM

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

3.4.9.2 The Reactor Coolant System shall remain open to the reactor building atmosphere unless repressurization is approved in a safety evaluation submitted to the NRC. This safety evaluation and associated procedures approved pursuant to Specification 6.8.2 shall specify the maximum pressure limits and over-pressure protection that is required.

3.5 COMMUNICATIONS

3.5.1 Control Room

Direct communication shall be maintained between the Control Room or the Command Center and personnel in the Reactor Building. As stated in Table 6.2-1, the additional SOL or SOL limited to fuel handling, notwithstanding location, will have direct communications with personnel in the Reactor Building performing CORE ALTERATIONS.

APPLICABILITY: During CORE ALTERATIONS

ACTION:

When direct communication between the Control Room or the Command Center and personnel in the Reactor Building as stated in the above specification cannot be maintained, suspend all operations involving CORE ALTERATIONS and restore communications to OPERABLE status.

APPLICABILITY: RECOVERY MODE.

ACTION:

With the containment internal pressure outside the above limits, restore the internal pressure to within the limits within 1 hour.

AIR TEMPERATURE

3.6.1.5 Primary containment average air temperature shall be maintained between 50°F and 130°F.

APPLICABILITY: RECOVERY MODE.

ACTION:

With the containment average air temperature outside the above limits, restore the average air temperature to within the limits within 24 hours.

3.6.3 CONTAINMENT PURGE EXHAUST SYSTEM

3.6.3.1 One train of the Containment Purge Exhaust System shall be OPERABLE.

APPLICABILITY: During Purge Operations

ACTION:

With no Containment Purge Exhaust train OPERABLE, secure the Containment Purge System and restore one train to OPERABLE status within 7 days.

3.6.4 COMBUSTIBLE GAS CONTROL

3.6.4.1 Deleted

HYDROGEN PURGE CLEANUP SYSTEM

3.6.4.3 Deleted

3.7.10 FIRE SUPPRESSION SYSTEMS

FIRE SUPPRESSION WATER SYSTEM

3.7.10.1 The FIRE SUPPRESSION WATER SYSTEM shall be OPERABLE with;

a. At least 2 of the following 4 high pressure pumps shall be OPERABLE with their discharge aligned to the fire suppression header:

   1. Unit 1 Circulating Water Flume Diesel Fire Pump
   2. Unit 1 River Water Intake Diesel Fire Pump
   3. Unit 2 River Water Intake Diesel Fire Pump
   4. Unit 1 River Water Intake Motor Fire Pump

b. Two (2) separate water supplies of the following four (4) shall be available with at least 90,000 gallons each:

   1. Altitude Tank
   2. Unit 1 Circulating Water Flume
   3. Unit 1 River Water Intake Structure
   4. Unit 2 River Water Intake Structure

c. An OPERABLE flow path capable of taking suction from a water supply and transferring the water through distribution piping with OPERABLE sectionalizing control or isolation valves to the yard hydrant curb valves and the first valve ahead of the water flow alarm device on each sprinkler, hose standpipe, or spray system riser required to be OPERABLE per Specification 3.7.10.2 and 3.7.10.4.

APPLICABILITY: RECOVERY MODE

ACTION:

a. With 3 pumps or 3 water supplies inoperable, restore the inoperable equipment to OPERABLE status within 7 days.

FIRE SUPPRESSION WATER SYSTEM (Continued)

ACTION (Continued)

b. With the Fire Suppression Water System otherwise inoperable:

1. Establish a backup Fire Suppression Water System within 24 hours.

2. Deleted.

DELUGE/SPRINKLER SYSTEMS

3.7.10.2 The Deluge and/or Sprinkler Systems located in the following areas shall be OPERABLE:

a. Diesel Generator Fuel Oil Tanks
b. Diesel Generator Building Air Intake
c. Air Intake Tunnel (Deluge - 2 of the 3 zones)
d. Hydrogen Purge Exhaust Filter AH-F-34#
e. Reactor Building Purge Exhaust Filters AH-F-31A/B#
f. Control Room Bypass Filter AH-F-5
g. Diesel Generator Rooms
h. Fuel Handling Building Exhaust Filter AH-F-14A/B#
i. Waste gas disposal filter WDG-F-1
j. Auxiliary Building exhaust filters AH-F-10A/B#
k. Southeast Storage Facility***

APPLICABILITY: RECOVERY MODE.

ACTION:

With one or more of the above required deluge and/or sprinkler systems inoperable, establish a roving (at least once perhour) fire watch with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days.

***This facility's Action Statement shall require a roving fire watch once per 24 hours instead of once per hour.

#Supply line may be isolated by a single manually operated valve.

HALON SYSTEM

3.7.10.3 The following Halon systems shall be OPERABLE with the storage tanks having at least 95% of full charge weight and 90% of full charge pressure (corrected to 70°F).

a. Cable Room and Transformer Room - Control Building 305' elevation.

b. Air Intake Tunnel (4 Zones)

APPLICABILITY: RECOVERY MODE

ACTION:

With one or more of the above required Halon systems inoperable, establish a roving (at least once per hour) fire watch* with backup fire suppression equipment for the unprotected area(s) within 1 hour; restore the system to OPERABLE status within 14 days.

FIRE HOSE STATIONS

3.7.10.4 The fire hose stations listed in Table 4.7-1 of the RECOVERY OPERATIONS PLAN shall be OPERABLE:

APPLICABILITY: RECOVERY MODE

ACTION:

With one or more of the fire hose stations shown in Table 4.7-1 inoperable, route an additional equivalent capacity fire hose to the unprotected area(s) from an OPERABLE hose station within 1 hour.

*Except in the air intake tunnel where a fire watch is not required.

3.9 RADIOACTIVE WASTE STORAGE

SPENT FUEL STORAGE POOL "A" WATER LEVEL MONITORING

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

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

ACTION:

a. With only one Spent Fuel Storage Pool "A" water level monitoring instrument OPERABLE, immediately verify that the water level is within limits, re-verify the level at least once per 24 hours and restore a second instrument to OPERABLE status within 7 days.

b. With no Spent Fuel Storage Pool "A" water level monitoring instruments OPERABLE, terminate all activities involving any Canister containing core material in or over Spent Fuel Storage Pool "A" and all operations involving changes in Spent Fuel Storage Pool "A" water inventory and restore at least one instrument to OPERABLE status within 24 hours.

SPENT FUEL STORAGE POOL "A" WATER LEVEL

3.9.2 The water level in Spent Fuel Storage Pool "A" shall be maintained as specified per NRC approved procedures.

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

ACTION:

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

FUEL TRANSFER CANAL (DEEP END) WATER LEVEL MONITORING

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

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

ACTION:

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

4.0.1 Surveillance Requirements of the RECOVERY OPERATIONS PLAN shall be applicable during the RECOVERY MODE or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement. The Surveillance Requirements shall be performed to demonstrate compliace with the OPERABILITY requirements of the Limiting Conditions for Operations and in accordance with the RECOVERY OPERATIONS PLAN; however, the RECOVERY OPERATIONS PLAN shall not be considered a part of these technical specifications. Changes to the RECOVERY OPERATIONS PLAN shall be approved by the NRC prior to implementation.

4.0.2 Each Surveillance Requirement of the RECOVERY OPERATIONS PLAN shall be performed within the specified time interval with:

a. A maximum allowable extension not to exceed 25% of the surveillance interval, and

b. A total maximum combined interval time for any 4 consecutive tests not to exceed 3.25 times the specified surveillance interval.

4.0.3 Performance of a Surveillance Requirement within the specified time interval shall constitute compliance with OPERABILITY requirements for a Limiting Condition for Operation and associated ACTION statements unless otherwise required by the specification.

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, changes in procedures as described in the Safety Analysis Report, Technical Evaluation Reports, or docketed System Descriptions, and 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 either one or four hour immediate notification to the NRC. Such reviews are performed after the fact. Review of events covered under this subsection shall include results of any investigations made and the recommendations

resulting from such investigations to prevent or reduce the probability of recurrence of the event. SRG shall review all one or four hour immediate notifications and make recommendations as appropriate.

e. Investigation of all reportable events 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 TMI2 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. The audit frequency shall be at least once per 12 months.

b. The performance, training and qualifications of the entire unit staff. The audit frequency shall be 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. The audit frequency shall be at least once per 6 months.

d. 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. The Emergency Plan and implementing procedures. The audit frequency shall be at least once per 12 months.

f. The Security Plan and implementing procedures. The audit frequency shall be at least once per 12 months.

g. The Radiation Protection Plan and implementing procedures. The audit frequency shall be at least once per 12 months.

h. The Fire Protection Program and implementing procedures. The audit frequency shall be 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 6.5.3.1 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.

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 EVENTS ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 of 10 CFR Part 50, and

b. Each REPORTABLE EVENT 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.

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 that:

a. The intent of the original procedure control is not altered, and

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

(2) For those procedures which do not affect the operational status of unit systems or equipment, the change is approved by two members of the responsible organization. If one of the two above signatures is not by a section manager/director within the Department having cognizance of the procedure being changed, the signature of that section manager/director within the department will also be required, and

c. The change is documented, Independent Safety Review completed, and the required reviews and approvals are obtained within 14 days, and

d. Those changes to procedures described by 6.8.2.2 are submitted to the NRC for review within 72 hours following approval by the management level specified for implementation by Section 6.5.1.9.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

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

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 Deleted.

[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 K20.407 of 10 CFR Part 20.

PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.8 Deleted.

THIRTY DAY WRITTEN REPORTS

6.9.1.9 Deleted.

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 I 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.

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 EVENTS 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.

ENCLOSURE 4

☆ U.S. GOVERNMENT PRINTING OFFICE: 1976-633-712

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

October 18, 1985

Docket No. 50-320

Docketing and Service Section
Office of the Secretary of the Commission

SUBJECT: Three Mile Island Nuclear Station, Unit 2
Operating License No. DPR-73
Docket No. 50-320
Amendment of Order

Two signed originals of the Federal Register Notice identified below are enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies ( ) of the Notice are enclosed for your use.

☐ Notice of Receipt of Application for Construction Permit(s) and Operating License(s).

☐ Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.

☐ Notice of Availability of Applicant's Environmental Report.

☐ Notice of Proposed Issuance of Amendment to Facility Operating License.

☐ Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.

☐ Notice of Availability of NRC Draft/Final Environmental Statement.

☐ Notice of Limited Work Authorization.

☐ Notice of Availability of Safety Evaluation Report.

☐ Notice of Issuance of Construction Permit(s).

☐ Notice of Issuance of Facility Operating License(s) or Amendment(s).

☒ Other: Amendment of Order

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

Enclosure:
As Stated

NRC FORM 102
(1-76)

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of	)	
	)	
METROPOLITAN EDISON COMPANY, ET AL.	)	Docket No. 50-320 OLA
	)	
(Three Mile Island Nuclear Station, Unit 2)	)	

CERTIFICATE OF SERVICE

I hereby certify that copies of "NRC STAFF NOTICE OF ISSUANCE OF AMENDMENT OF ORDER AND MOTION TO CONFORM PROPOSED TECHNICAL SPECIFICATIONS IN ACCORDANCE THEREWITH" in the above-captioned proceeding have been served on the following by deposit in the United States mail, first class, or as indicated by an asterisk through deposit in the Nuclear Regulatory Commission's internal mail system, this 22nd day of October, 1985:

Sheldon J. Wolfe, Chairman
Administrative Judge
Atomic Safety and Licensing Board
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555*

George F. Trowbridge, Esq.
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Dr. Oscar H. Paris
Administrative Judge
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Washington, D.C. 20555*

Dr. Judith H. Johnsrud
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433 Orlando Avenue
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Mr. Frederick J. Shon
Atomic Safety and Licensing Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555*

Atomic Safety and Licensing
Board Panel
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555*

Atomic Safety and Licensing Appeal
Board Panel (8)
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555*

Docketing and Service Section
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