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December 28, 1987
4410-87-L-0187/0279P

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
7920 Norfolk Avenue, Phillips Building
Bethesda, MD 20014

Dear Dr. Murley:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
10 CFR 55 Exemption Request

GPU Nuclear letter 4410-87-L-0183 dated December 28, 1987, submitted Revision 3 to the TMI-2 Licensed Operator Requalification Training Program. As noted in that submittal, pursuant to 10 CFR 55.11, "Specific Exemptions," GPU Nuclear hereby requests an exemption from various portions of 10 CFR 55, "Operator Licenses," as they pertain to the requirements for a plant simulation facility and hourly requirements for maintaining an active license.

Attachment 1 identifies those portions of 10 CFR 55 concerning the requirements of a plant simulation facility from which an exemption is requested and provides relevant justification. Due to the unique, cold-shutdown condition of TMI-2, there is no simulation facility that reflects the current condition of TMI-2.

Additionally, as described in Attachment 2, GPU Nuclear hereby requests an exemption from the requirements of 10 CFR 55.53(e) and (f), "Conditions of Licenses," which specify the hourly requirements for maintaining an active license. In lieu of these requirements, GPU Nuclear has proposed reduced hourly requirements which will ensure adequate licensed operator familiarity with current plant conditions before performing active license duties.

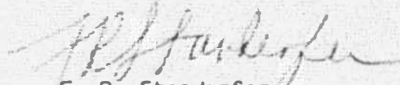
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GPU Nuclear Corporation is a subsidiary of the General Public Utilities Corporation.

M003
w/check
\$150.00

Per the requirements of 10 CFR 170, an application fee of \$150.00 is enclosed.

Sincerely,



F. R. Standerfer
Director, TMI-2

RDW/eml

Attachments

Enclosed: GPU Nuclear Corp. Check No. 009016

cc: Chief, Operations Branch, Division of Reactor Safety - Mr. R. M. Gallo
Section Chief, PWR - Mr. R. M. Keller
Regional Administrator, Region 1 - W. T. Russell
Director, TMI-2 Cleanup Project Directorate - Dr. W. D. Travers

EXEMPTION REQUESTS FROM SIMULATOR TRAINING

The recent revision to 10 CFR 55, "Operators' Licenses," in part, added requirements for a "Plant-referenced simulator" and a "Simulation Facility." 10 CFR 55.4 defines these terms as follows:

- o Plant-referenced Simulator - "a simulator modeling the systems of the reference plant with which the operator interfaces in the control room, including operating consoles, and which permits use of the reference plant's procedures. A plant-referenced simulator demonstrates expected plant response to operator input, and to normal transient and accident conditions to which the simulator has been designed to respond."
- o Simulation Facility - "one or more of the following components alone or in combination, used for the partial conduct of operating tests for operators, senior operators, and candidates:
 - 1. The plant,
 - 2. A plant-referenced simulator,
 - 3. Another simulation device."

Due to the current status of TMI-2, GPU Nuclear hereby requests exemptions from the following sections of 10 CFR 55 related to the requirements for these facilities:

- o 10 CFR 55.45(b)(1), "Implementation - Administration" - This section requires that: "The operating test will be administered in a plant walkthrough and in either -
 - (i) A simulation facility which the Commission has approved for use after application has been made by the facility licensee, or
 - (ii) A simulation facility consisting solely of a plant-referenced simulator which has been certified to the Commission by the facility licensee."
- o 10 CFR 55.45(b)(2), "Schedule for facility licensee" - Subsections (i) through (iv) detail the schedular requirements for implementation of 10 CFR 55.45(b)(1) and (ii).
- o 10 CFR 55.45(b)(4), "Application for and approval of simulation facilities" - This section identifies the application requirements for those licensees which propose, in accordance with paragraph (b)(1)(i) of this section, to use a simulation facility that is other than solely a plant-referenced simulator as defined in 10 CFR 55.4.
- o 10 CFR 55.45(b)(5), "Certification of simulation facilities" - This section identifies the certification requirements for those licensees which propose in accordance with paragraph (b)(1)(ii) of this section, to use a simulation facility consisting solely of a plant-referenced simulator as defined in 10 CFR 55.4.

- o 10 CFR 55.59(a)(2), "Requalification Requirements," - This section states, "Each licensee shall... (2) Pass a comprehensive requalification written examination and an operating test." 10 CFR 55.45(b)(1) requires that a simulation facility be utilized in the performance of the operating test. Thus, GPU Nuclear requests an exemption from the requirement to utilize a simulation facility in satisfying the requirements of 10 CFR 55.59(a)(2).

Justification for Exemption

The requirements of 10 CFR 55 are primarily designed for operating, test, and research reactors. Due to the unique, cold-shutdown condition of TMI-2, there is no plant-referenced simulator or simulation device that reflects the current condition of TMI-2. Additionally, use of the plant as a simulation facility is not practical since, per the Statements of Consideration (reference 52 FR 9453 published March 31, 1987), this would require manipulation of the plant which is not authorized by the plant's license. The Statement of Consideration for 10 CFR 55 states that use of the plant as a simulation facility is more applicable to: "...older plants without access to plant-referenced simulators where manipulations of the plant, to the extent, consistent with plant conditions, might be used to demonstrate familiarity with the plant for which the candidate could be licensed."

Additionally, TMI-2 Technical Specification Change Request (TSCR 53), submitted to the NRC via GPU Nuclear letter 4410-87-L-0042 dated April 23, 1987, requests elimination of TMI-2 Technical Specification requirements for licensed operators upon completion of the TMI-2 defueling program which is currently projected for the fourth quarter of 1988. Thus, due to the relatively short period of time remaining in the cleanup program, development of an appropriate facility is not practical.

In lieu of the above requirements for which an exemption is requested, TMI-2 proposes to requalify operators in accordance with Revision 3 to the TMI-2 Licensed Operator Requalification Training Program (reference GPU Nuclear letter 4410-87-L-0183).

EXEMPTION REQUESTS FROM CONDITIONS OF LICENSEES

GPU Nuclear requests an exemption from the following requirements of sections (e) and (f) of 10 CFR 55.53, "Conditions of licensees:"

- o 10 CFR 55.53(e) - GPU Nuclear requests exemption from the requirement of 10 CFR 55.53(e) which states, "To maintain active status, the licensee shall actively perform the functions of an operator or senior operator on a minimum of seven 8-hour or five 12-hour shifts per calendar quarter."

In lieu of the above requirement, GPU Nuclear proposes that TMI-2 licensed operators be allowed to maintain active status by actively performing their licensed functions for a minimum of three (3) 8-hour shifts per calendar quarter.

- o 10 CFR 55.53(f) - GPU Nuclear requests an exemption to the requirements of 10 CFR 55.53(f)(2) which states: "If paragraph (e) of this section is not met before resumption of functions authorized by a license issued under this part, an authorized representative of the facility licensee shall certify the following:...(2) that the licensee has completed a minimum of 40 hours of shift functions under the direction of an operator or senior operator as appropriate and in the position to which the individual will be assigned. The 40 hours must have included a complete tour of the plant and all required shift turnover procedures..."

In lieu of the above requirement, GPU Nuclear proposes that TMI-2 operators who are in an inactive status be permitted to be restored to an active status upon completion of eight (8) hours of shift functions.

Justification for Exemption

The above requirements for which an exemption is requested are intended for operating facilities. It is noteworthy that 10 CFR 55.53(e) and (f) allows for reduction in the above requirements for test and research reactors which are more applicable to TMI-2's current condition. Specifically, 10 CFR 55.53(e) states, "For test and research reactors the licensee shall actively perform the functions of an operator or senior operator for a minimum of four hours per calendar quarter." GPU Nuclear proposes that TMI-2 operators maintain their active status by performing a minimum of three (3) 8-hour shifts per calendar quarter. Based on current operators' requalification training at TMI-2, GPU Nuclear believes that the proposed exemption will ensure adequate licensee familiarity with current plant conditions before performing active license duties.

Similarly, 10 CFR 55.53(f)(2) states, "For test and research reactors, a minimum of six hours must have been completed." GPU Nuclear proposes that TMI-2 operators who are in an inactive status be permitted to be restored to an active status upon eight (8) hours of shift functions which includes a plant tour and required shift turnover procedures. This proposal is consistent with the requirement of 10 CFR 55.53(f)(2) which states, "For senior operators limited to fuel handling under paragraph (c) of this section,

one shift must have been completed." Since defueling activities are currently the primary objective at TMI-2, GPU Nuclear believes that the proposed exemption will ensure adequate licensee familiarity with current plant conditions before performing active license duties.