May 26, 1993

Docket No. 50-320
Dr. R. L. Long
Director, Corporate Services/Director, TMI-2
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057

Dear Dr. Long:

SUBJECT: RECOVERY OPERATIONS PLAN CHANGE REQUEST NO. 46 (TAC NO. M83028)

In your letter dated March 17, 1992 (Technical Specification Change Request No. 67 and Recovery Operations Plan Change Request No. 46) with Revision 1 dated June 18, 1992, and Revision 2 dated December 23, 1992, you requested changes to both the TMI-2 Technical Specifications and the TMI-2 Recovery Operations Plan (ROP). Your proposed changes to the TMI-2 ROP are approved by this letter. The revised ROP pages are enclosed. Your request for changes to the TMI-2 Appendix A and Appendix B Technical Specifications and your Revision 2 to the ODCM are approved in a separate letter issued concurrently with this change to the TMI-2 ROP.

ROP change request 46 revises the TMI-2 ROP by relocating the surveillance requirements of the station radiation monitors to the Offsite Dose Calculation Manual (ODCM). The relocation of the surveillance requirements to the ODCM is in accordance with the guidance in NRC staff Generic Letter 89-01 dated January 31, 1989.

Based on our enclosed safety evaluation, we have concluded that the proposed change is consistent with the guidance in NRC staff Generic Letter 89-01 and will not adversely affect the health and safety of the public. This change does not constitute an unreviewed safety question, nor does it involve a significant hazard or an environmental impact. Our approval of your ROP Change Request No. 46 is designated as change approval 44. These changes are effective as of the date of this letter.

Sincerely,
ORIGINAL SIGNED BY
Seymour H. Weiss, Director
Non-Power Reactors and Decommissioning
Project Directorate
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosures:
1. Changed Pages to the Recovery Operations Plan
2. Safety Evaluation

cc w/enclosures:
See next page

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

May 26, 1993

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Seymour H. Weiss

Seymour H. Weiss, Director
Non-Power Reactors and Decommissioning
Project Directorate
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

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2. Safety Evaluation

cc w/enclosures:
See next page

Dr. R. L. Long
GPU Nuclear Corporation Unit No. 2

Three Mile Island Nuclear Station
Docket No. 50-320

cc:

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ATTACHMENT TO RECOVERY OPERATIONS PLAN CHANGE 44

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

Replace the following pages of the Three Mile Island Unit 2 Recovery Operations Plan with the attached pages. The revised pages are identified by change number and contain vertical lines indicating the area of change.

Remove	Insert
i	i
4.3-1	4.3-1
4.3-4	4.3-4
4.3-5	4.3-5
4.3-6	4.3-6
4.3-7	4.3-7
4.3-8	4.3-8

INDEX

SURVEILLANCE REQUIREMENTS

4.3 INSTRUMENTATION

4.3.1 NEUTRON MONITORING INSTRUMENTATION

4.3.1.1 Each intermediate and source range neutron monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequency shown in Table 4.3-1.

4.3.2 ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

Deleted

4.3.3 MONITORING INSTRUMENTATION

METEOROLOGICAL INSTRUMENTATION

4.3.3.4 Each of the meteorological monitoring instrumentation channels shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-5.

ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION

4.3.3.5 Each of the Essential Parameters Monitoring Instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

CHLORINE DETECTION SYSTEMS

4.3.3.7 Each chlorine detection system shall be demonstrated OPERABLE by performance of a CHANNEL CHECK at least once per 24 hours, and a CHANNEL FUNCTIONAL TEST at least once per 31 days. At least once per 18 months, the following inspections and maintenance shall be performed:

a. Check constant head bottle level and refill as necessary,

b. Clean the sensing cells,

c. Check flow meter operation and clean or replace filters and air lines as necessary.

d. Check air pump for proper operation, and

e. Verify that the detector responds to HCL.

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO FACILITY OPERATING LICENSE NO. DPR-73

GPU NUCLEAR CORPORATION

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-320

1.0 INTRODUCTION

By letter dated March 17, 1992, GPU Nuclear Corporation (GPUN or the licensee) requested the approval of a change to the Three Mile Island Nuclear Station, Unit No. 2 (TMI-2) Appendix A and Appendix B Technical Specifications (A-TS and B-TS respectively). Included in this request to change the license was a request to change the TMI-2 Recovery Operations Plan (ROP). The ROP is a separate document that contains the surveillance requirements for TMI-2. The surveillance requirements were removed from the TMI-2 Appendix A technical specifications by NRC Order dated February 13, 1980. They have been maintained since that date as a separate document amendable by letter authorization by the NRC staff.

The purpose of the current ROP amendment request and the associated ROP is to relocate the TMI-2 Technical Specifications related to radiological effluents to the Offsite Dose Calculation Manual (ODCM) in accordance with the guidance in NRC staff Generic Letter 89-01 dated January 31, 1989. A copy of the proposed ODCM was enclosed for NRC staff review in the March 17, 1992 submittal. On June 18, 1992, the licensee submitted Revision 1 to their amendment request. Revision 1 provided an updated copy of the TMI Site ODCM. The updated copy of the ODCM was identified as Revision 2. On December 23, 1992, the licensee submitted Revision 2 to their amendment and ROP change request. The December 23, 1993 revision requested that the TMI-2 Technical Specifications reporting requirements related to quarterly dose assessment and radioactive effluents be changed consistent with the provisions of 10 CFR 50.36a(a)(2). Neither the March 17, 1992 nor the December 23, 1992 submittals revised the licensee's proposed changes to the ROP originally submitted by letter dated March 17, 1992.

2.0 DISCUSSION AND EVALUATION

The licensee's request for changes to the TMI-2 Appendix A and Appendix B Technical Specifications and their Revision 2 to the ODCM are approved in a separate letter issued concurrently with this change to the TMI-2 ROP.

Section 4.3.3.1, "Radiation Monitoring Instrumentation", of the TMI-2 ROP refers to Table 4.3-3 which lists and defines operability for each required station radiation monitor. The licensee proposes removing Section 4.3.3.1 and

the corresponding Table 4.3-3 from the ROP and relocating the remaining applicable requirements to the ODCM Part II, Section 3.3 and Table 2.3-1. The current ROP requirement specifies monitoring at a number of locations in the facility at specific facility modes. The licensee is currently in Mode 3 and is physically unable to reenter Modes 1 or 2. The licensee, in ROP change 46, requested that monitoring requirements defined for only Modes 1 and 2, and therefore no longer applicable to TMI-2, be deleted from the original Table 4.3-3. These are the vent monitor for the Containment Air Control Envelope (Mode 1 only), Fuel Handling Building Exhaust Monitors (Modes 1 and 2 only), Submerged Demineralizer System (SDS) monitors (SDS is no longer operating and has been dismantled), Fuel Transfer Canal (Modes 1 and 2 only), Fuel Pool "A" (Modes 1 and 2 only), Fuel Handling Building Truck Bay (Modes 1 and 2 only), and Reactor Building End Fitting Storage Area (Mode 1 only). The remaining monitoring requirements for the Containment and the Waste Handling and Packaging Facility are to be transferred to the ODCM. The staff finds the proposed relocation of the remaining operable requirements to the ODCM acceptable and consistent with NRC staff Generic Letter 89-01.

The licensee also requested that Section 4.3.3.1, "Radiation Monitoring Instrumentation", in the text of the ROP, that refers to the requirements in Table 4.3-3 also be deleted. Since the table would no longer be part of the ROP there is no need to retain an operability statement in the text. The licensee also proposes updating the index (table of contents) to the ROP to reflect the deletion of Section 4.3.3.1. The staff finds these administrative changes acceptable.

3.0 CONCLUSION

The proposed changes are consistent with the guidance in NRC staff Generic Letter 89-01 and will not adversely affect the health and safety of the public. These changes do not constitute an unreviewed safety question, nor do they involve a significant hazard or an environmental impact. Since the licensee is eliminating requirements in the ROP that are no longer applicable and relocating the remaining requirements to the ODCM, and making some minor administrative changes, the staff finds the changes acceptable.

Principal Contributor: Michael T. Masnik

Date: May 26, 1993