

June 15, 1984

Docket No. 50-320

Mr. B. K. Kanga, Director
Three Mile Island Unit 2
GPU Nuclear Corporation
P.O. Box 480
Middletown, PA 17057

Dear Mr. Kanga:

Subject: Three Mile Island Nuclear Station, Unit 2
Operating License No. DPR-73
Docket No. 50-320
Technical Specification Change Request No. 44
Organization Plan Change No. 8

Distribution:
Docket No. 50-320

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The U.S. Nuclear Regulatory Commission has issued the enclosed Amendment of Order and Organization Plan Revision 8 for the Three Mile Island Nuclear Station, Unit 2 (TMI-2). The Amendment of Order which modifies the Proposed Technical Specifications (PTS) and the Organization Plan Revision were requested by General Public Utilities Nuclear Corporation (GPUHC) in two separate letters, both dated November 11, 1983. In these letters the licensee requested that the PTS and the Organization Plan be revised to reflect that the title of Plant Training Manager, TMI-2 has been replaced by the Manager Plant Training, TMI.

This Amendment of Order and Organization Plan Change Approval are effective upon issuance. 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.

Copies of the related Safety Evaluation and revised pages for the Proposed Technical Specifications and the Recovery Operations Plan are enclosed.

Sincerely,

Original signed by

B. J. Snyder

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

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PDR ADOCK 05000320
P PDR

Enclosures:

1. Amendment of Order
2. Safety Evaluation
3. Proposed Technical Specification Page Changes
4. Approved Organization Plan Change No. 8

cc: See Next Page

5/18/84

5/18/84

5/18/84

5/21/84

ELD MWilcove 5/14/84	DD NRR EGCase 5/14/84	D:NRR HRDenton 5/15/84
TMIPO: NRR TCPoindexter;bg RAWeller	PD TMIPO: NRR BJSnyder	DTF: LOR: NRR FAIllenspach
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Mr. B. K. Kanga

-2-

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Docket No. 50-320

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 letter dated November 11, 1983, the licensee requested changes to the Proposed Technical Specifications (PTS), Appendix A for Three Mile Island, Unit 2 (TMI-2), Sections 6.4.1 and 6.4.2. These sections currently state that the Plant Manager, TMI-2, is responsible for the retraining and replacement training for the unit staff and the Fire Brigade training program for Three Mile Island, Unit 2. GPUNC has requested that the title of the person with the responsibilities discussed above be called the Manager Plant Training, TMI. This new title will encompass the same TMI-2 responsibilities as previously stated in addition to similar duties at Three Mile Island, Unit 1. The new position of Manager Plant Training, TMI, will report to the Director, Training and Education, who reports to the Vice President, Nuclear Assurance. The old position of Plant Manager, TMI-2 had the same reporting requirements.

The staff's safety assessment of this matter 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 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. J. Snyder, USNRC, from R. C. Arnold, GPUNC, Technical Specification Change Request No. 44, dated November 11, 1983, (2) Letter to B. J. Snyder, USNRC, from R. C. Arnold, GPUNC, Organization Plan Revision No. 8, dated November 11, 1983, and (3) 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

A handwritten signature in dark ink, appearing to read "H. R. Denton", written in a cursive style.

Harold R. Denton, Director
Office of Nuclear Reactor Regulation

Effective Date: June 15 , 1984
Dated at Bethesda, Maryland
Issuance Date: June 15 , 1984

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 two letters, dated November 11, 1983, General Public Utilities Nuclear Corporation (GPUNC), requested changes and provided supporting information to modify the Proposed Technical Specifications (PTS) of License No. DPR-73 and the Organization Plan (OP). The requested change would replace the Plant Training Manager TMI-2, by the Manager Plant Training, TMI, as discussed in Sections 6.4.1 and 6.4.2 of the TMI-2 Proposed Technical Specifications and also reflect this change in the TMI-2 Organization Plan.

DISCUSSION AND EVALUATION

Section 6.4 of the PTS currently states that the Plant Training Manager, TMI-2, is responsible for the retraining and the replacement training program for unit staff and the Fire Brigade training program for Three Mile Island, Unit 2. GPUNC has requested that the title of the person responsible for the above functions be called the Manager Plant Training, TMI. This new title will encompass the same TMI-2 responsibilities as previously stated in addition to similar duties at Three Mile Island, Unit 1. The

new position of Manager Plant Training, TMI, will report to the Director, Training and Education, who reports to the Vice President, Nuclear Assurance. The old position of Plant Manager, TMI-2 had the same reporting requirements.

We have reviewed the proposed organization change and concluded that it will not decrease the effectiveness of the training program at TMI-2. Therefore, the proposed change to the TMI-2 Proposed Technical Specifications and the Organization Plan Revision are 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), that 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.

FACILITY OPERATING LICENSE NO. DPR-73

DOCKET NO. 50-320

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

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 Manager Plant Training TMI and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977 and Appendix "A" of 10CFR 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 Manager Plant Training TMI 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).

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ORGANIZATION PLAN - TMI-2

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 as 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.

ADMINISTRATION

2.1 Plan Approval and Audits

- 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 approved by the NRC prior to implementation.
- 2.1.3 The Quality Assurance Department shall conduct annual audits to verify conformance to the organization with the Organization Plan. The Safety Review Group (SRG) shall review the results of such audits and make recommendations as appropriate.

2.2 Technical Specification Title Cross-Reference

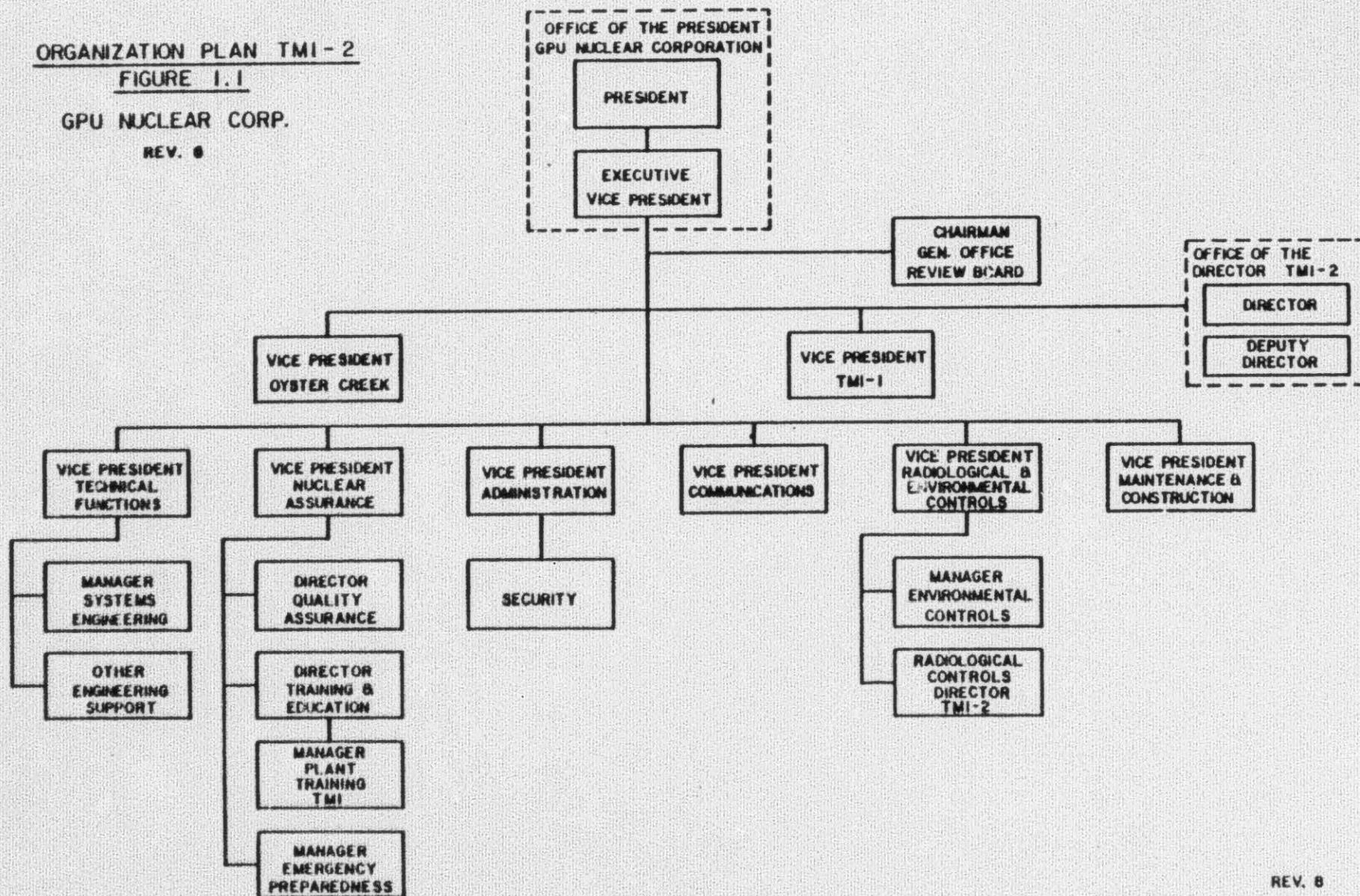
This section has been deleted. The TMI-2 Recovery Technical Specifications have been revised to properly reflect GPUNC individual titles.

ORGANIZATION PLAN TMI-2

FIGURE 1.1

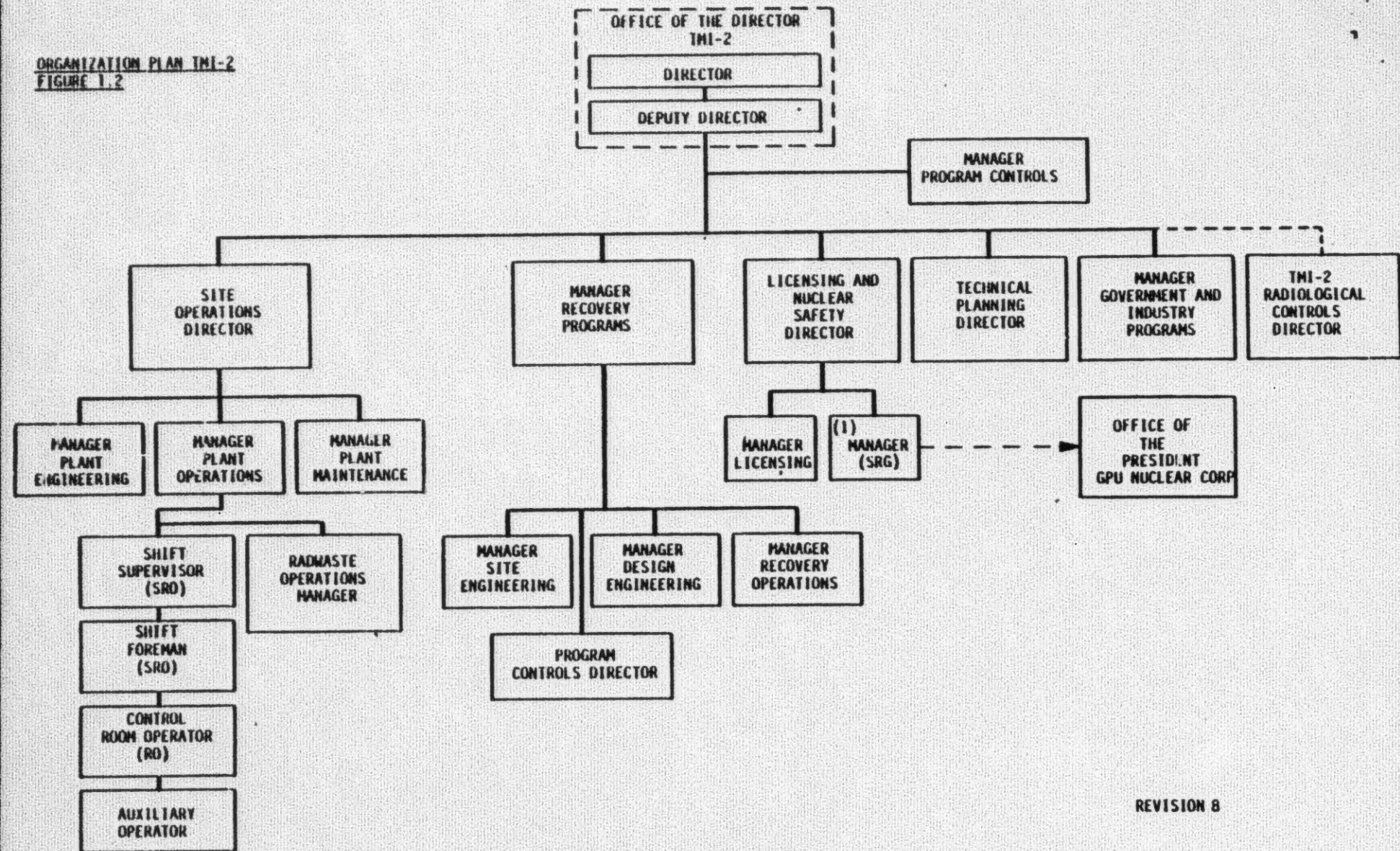
GPU NUCLEAR CORP.

REV. 8



REV. 8

ORGANIZATION PLAN TMI-2
FIGURE 1.2



REVISION 8

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