



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

July 16, 1979

ORIGINAL
POOR

Mr. J. G. Herbein
Vice President - Generation
Metropolitan Edison Company
P. O. Box 542
Reading, Pennsylvania 19640

Dear Mr. Herbein:

Based on an evaluation of the current status of the radwaste management effort at Three Mile Island Nuclear Station, Unit 2, and discussions with unit staff, we hereby issue the attached temporary change to the Technical Specifications with regard to administrative controls on the Radwaste Operations Review Committee (RORC). The establishment of this committee is necessary to adequately review procedures, tests, modifications, events and radiological hazards associated with radwaste management. The RORC will function in a similar and parallel manner to the existing Plant Operations Review Committee (PORC). The RORC is being formed at this time to immediately process the existing backlog of procedures on new radwaste equipment and revisions to existing radwaste equipment. The attached pages are to be added to Section 6 of the existing Technical Specifications until such time as new specifications for TMI-2 are issued.

Sincerely,

R. H. Vollmer, Director
TMI-2 Support

Enclosure:
As Stated

cc: V. Stello
J. Collins
D. Eisenhut
B. Grimes
H. Denton

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ADMINISTRATIVE CONTROLS

6.5.3 RADWASTE OPERATIONS REVIEW COMMITTEE (RORC)

FUNCTION

6.5.3.1 The Radwaste Operations Review Committee (RORC) shall function to advise the Manager Radwaste on all matters related to radioactive waste management.

COMPOSITION

6.5.3.2 The Radwaste Operations Review Committee shall be designated by Manager Radwaste and be composed of:

- a. Chairman - who shall have an academic degree in engineering or physical science field and a minimum of five years of applicable experience.
- b. 1 Member - who shall meet or exceed the qualifications of Regulatory Guide 1.8, September 1975.
- c. 3 Members - who shall meet or exceed the qualifications of ANSI N18.1 - 1971.

ALTERNATIVES

6.5.3.3 All alternate members shall be appointed in writing by the RORC Chairman to serve on a temporary basis; however, no more than two alternates shall participate as voting members in RORC activities at any one time.

MEETING FREQUENCY

6.5.3.4 The RORC shall meet at least once per calendar month and as convened by the Chairman or his designated alternate.

QUORUM

6.5.3.5 A quorum of the RORC shall consist of the Chairman or Vice Chairman and four members including alternates.

RESPONSIBILITIES

6.5.3.6 The Radwaste Operations Review Committee shall be responsible for:

- a. Review of 1) all procedures required by Specification (6.8) and changes thereto, 2) any other proposed procedures or changes thereto as determined by the Radwaste Manager to affect radioactive waste management.

1012 301

ADMINISTRATIVE CONTROLS

- b. Review of all proposed tests and experiments that affect radioactive waste management.
- c. Review of proposed changes to specific Appendix A and Appendix "B" Technical Specifications.
- d. Review of all proposed changes or modifications to radwaste systems or equipment that affect radioactive waste management.
- e. Investigation of all violations of the Technical Specification identified in c. above including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence to the Manager-Radwaste.
- f. Review of radwaste related events requiring 24 hour notification to the Commission.
- g. Review of radwaste related activities to detect potential radiological hazards.
- h. Performance of special reviews, investigations or analyses and reports thereon as requested by the Manager-Radwaste.
- i. Review of the radioactive waste management portions of the Recovery Operations Plan and implementing procedures and shall submit recommended changes to the Manager Radwaste and the Manager Generation Station-Nuclear.
- j. Review of the Radiation Protection Plan and implementing procedures and shall recommend changes to the Manager Radwaste.

AUTHORITY

6.5.3.7 The Radwaste Operations Review Committee shall:

- a. Recommend to the (Manager Radwaste) in writing, approval or disapproval of items considered under 6.5.3.6(a) through (d) above.
- b. Render determinations in writing with regard to whether or not each item considered under 6.5.3.6(a) through (e) above constitutes an unreviewed safety question.

RECORDS

6.5.3.8 The Radwaste Operations Review Committee shall maintain written minutes of each meeting and copies shall be provided to the Manager-Radwaste and the RRC Chairman.

1012 302

ADMINISTRATIVE CONTROLS

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, November, 1972.
- b. Applicable Sections Recovery Operations Plan implementation.
- c. Radwaste Management Surveillance and test activities.
- d. Radiation Protection Plan implementation.
- e. RECOVERY MODE implementation. (Specifically RECOVERY MODE procedures which involve a reduction in the margin of safety, including those which:
 1. Could increase the likelihood or magnitude of radiological releases in radwaste activities.
 2. Could increase the likelihood of failures in radwaste systems important to safety.
 3. Alter the distribution or processing of significant quantities of stored radioactivity or radioactivity being released through known flow paths in radwaste systems.

6.8.2 Each procedure of 6.8.1 above, and changes thereto, shall be reviewed by the Radwaste/Operations Review Committee and approved by the Manager-Radwaste prior to implementation and review periodically as set forth in administrative procedures. Each procedure of 6.8.1.b, f. and g. above, and changes thereto, shall be submitted to the NRC prior to implementation; these procedures, and changes thereto, shall be subject to approval by the NRC prior to implementation. The Manager Radwaste shall have responsibility for determining which procedures are in the 6.8.1.b., f, and g. category.

6.8.3.1 Temporary changes to procedures of 6.8.1 a., c., d. and e. above may be made provided:

- a. The intent of the original procedure is not altered.
- b. The change is approved by two members of the radwaste management staff, at least one of who is a qualified operator on the radwaste systems affected.
- c. The change is documented, reviewed by the Radwaste Operations Review Committee and approved by the Manager Radwaste within 14 days of implementation.

6.8.3.2 Temporary changes to procedures of 6.8.1.b, f. and g. may be made provided the provisions of 6.8.3.1 are satisfied and the change is submitted to the NRC for review within 72 hours.