

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO POST-DEFUELING MONITORED STORAGE  
FACILITY OPERATING LICENSE NO. DPR-73

GPU NUCLEAR CORPORATION

THREE MILE ISLAND NUCLEAR STATION, UNIT 2

DOCKET NO. 50-320

February 1992

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1.0 INTRODUCTION

By letter of August 16, 1988 as supplemented<sup>1</sup> the General Public Utilities Nuclear Corporation (the licensee) requested an amendment to Facility Operating License No. DPR-73 for the Three Mile Island Nuclear Station Unit 2 (TMI-2). Included in the August 16, 1988 letter transmission were the proposed amended facility license for Post-Defueling Monitored Storage, proposed Technical Specifications, and the Post-Defueling Monitored Storage (PDMS) Safety Analysis Report (SAR). The proposed amendment would permit the licensee to place the TMI-2 facility in a monitored storage condition. The requested changes to License No. DPR-73, and to appendices A and B (the Technical Specifications and the Environmental Technical Specifications, respectively) will also modify the license to a possession-only license (POL).

The POL establishes requirements that are applicable only to TMI-2 in the post-accident, inoperable and essentially defueled condition of the facility. As such, although the U.S. Nuclear Regulatory Commission (NRC) must approve revisions to the Technical Specifications and be notified of specified actions and environmental emissions from the facility during PDMS, the licensee may proceed with some activities (such as periodic entries into the reactor building and the Auxiliary and Fuel Handling Building (AFHB) to conduct inspections, surveillance, radiological surveys, radiological waste processing, remedial decontamination, and some maintenance to support these activities, as well as preventive maintenance on a limited number of operational systems) if these activities are permitted by the POL and 10 CFR Part 50.59, and do not foreclose options or significantly increase the cost of a decommissioning option.

This document was prepared by the Pacific Northwest Laboratory (PNL) under the direction of the NRC staff to assess the licensee's proposed license amendment. The NRC staff adopts this evaluation and where the term "staff" appears in this document, it refers to observations, analyses or conclusions made by PNL and adopted by the NRC staff. A Technical Evaluation Report (TER), issued concurrently with this document, was also prepared by PNL under the direction of the NRC staff to provide additional details.

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<sup>1</sup>Letters of January 8, 1989, February 9, 1989, March 31, 1989, June 26, 1989, October 10, 1989, November 22, 1989, June 21, 1990, October 15, 1990, November 7, 1990, February 19, 1991, April 19, 1991, June 21, 1991, August 28, 1991, October 9, 1991, and January 13, 1992.

PDMS was initially proposed in a GPU Nuclear Corporation (GPU) letter dated December 2, 1986 and was expanded when the licensee submitted its environmental evaluation of PDMS on March 11, 1987. In response to the licensee's proposal and request of August 16, 1988 to amend the Facility Operating License, the NRC evaluated the environmental impacts associated with PDMS. A draft supplement (Supplement No. 3) to the original Programmatic Environmental Impact Statement (PEIS) was published in April 1988. This draft supplement was circulated to Federal, state, and local government agencies and to interested members of the public for comment. A final supplement was published in August 1989, which evaluated the environmental impact of the licensee's proposal for PDMS as well as a number of alternatives and established ranges for the expected plant conditions and the expected radiation exposure. The NRC staff concluded in PEIS Supplement 3 that the licensee's proposal to place the facility in monitored storage can be implemented without significant environmental impact and that it will not significantly affect the quality of the human environment. Further, implementation of the licensee's proposal would result in occupational dose savings and reduced transportation impacts over other alternatives considered in PEIS Supplement 3.

Since the time of the licensee's original request for an amendment (August 1988), the licensee has submitted 15 supplements to the PDMS SAR. These supplements provided clarifications to the PDMS SAR and to the proposed changes to the Technical Specifications. In addition to editorial changes, these clarifications included retaining portions of the Technical Specification requirements, for example, maintaining primary containment isolation, performing an unfiltered leak rate test of the reactor containment building, maintaining operability of the containment air locks, limitations on the removal and rearrangement of fuel in the reactor vessel, limiting loads which may travel over the reactor vessel, providing specifications for sealed source integrity, and specifying administrative controls including organization, staff qualifications, training, technical review and audit, independent onsite safety review group, procedures and programs, reporting requirements, records retention, process control program, and the Offsite Dose Calculation Manual.

The licensee's original request for an amendment and its supplements were issued after the publication of the staff's August 1989 PEIS Final Supplement 3. The staff has reviewed the information submitted by the licensee and has concluded in the attached PDMS TER, and an Environmental Assessment prepared in connection with this action, that the supplemented information provided by the licensee does not alter the conclusions found in the Final Supplement to the PEIS.

## 2.0 BACKGROUND

Three Mile Island Unit-2 was issued an operating license on February 8, 1978. On March 28, 1979, an accident at the TMI-2 facility involved a loss of reactor coolant and resulted in serious damage to the reactor fuel. On July 20, 1979, the NRC issued an order suspending the licensee's authority to operate the TMI-2 facility and requiring that the licensee maintain the facility in a shutdown condition in accordance with approved operating and contingency procedures. Initially, because the exact extent of the damage was

unknown, it appeared that the facility could be refurbished and operated again. A subsequent order dated February 11, 1980, provided new proposed Technical Specifications (referred to as Recovery Technical Specifications), which modified or reissued all Technical Specifications in Appendix A and sections of Appendix B. These Technical Specifications were contested by a member of the public and were not formally incorporated into the TMI-2 license until January 27, 1987. Between February 11, 1980 and January 27, 1987, changes to the proposed Technical Specifications were made by Modification of Order. A total of 22 Modifications of Order were made.

There have been 40 amendments to the Technical Specifications since the operating license was issued. These highly modified Technical Specifications bear little resemblance to the Technical Specifications of any operating facility licensed under 10 CFR Part 50. Many requirements applicable to a normal operating reactor were dropped and new requirements, specific to TMI-2 cleanup, were added. Currently no defined operational safety limits are contained in Section 2 of the Technical Specifications. Section 3 contains approximately one third of the requirements present in the Technical Specifications of a normal operating reactor. There are no requirements for licensed operators remaining in Section 6. The surveillance requirements (typically in Section 4 of a facility's Technical Specifications) were removed and put in a separate document called the Recovery Operations Plan, which can be modified without issuing an amendment to the Technical Specifications. There have been 43 changes to the Recovery Operations Plan since its issuance. For completeness, changes to the Recovery Operations Plan are discussed in this document although they could be modified by letter approval from the NRC. It is the licensee's intention to place the surveillance requirements for PDMS back in the Technical Specifications and eliminate the need for the Recovery Operations Plan.

The current Technical Specifications require in Section 3.9.13 that accident generated water be disposed of in accordance with NRC approved procedures. The NRC staff currently reviews procedures and changes that are related to the operation of the evaporator system used to dispose of the accident generated water. The licensee has proposed to change this Technical Specification in a separate licensing action. The proposed change would replace the requirement for NRC approval with a series of performance based specifications related to required decontamination factors and effluent limits. Since this is a separate licensing action being considered by the NRC staff, it is not discussed further in this document.

The licensee has retained a 10 CFR Part 50 license since the Atomic Energy Act of 1954, as amended, requires a license for possession of a defueled reactor.

During the cleanup and defueling phase, three distinct operational modes as specified in Amendment No. 30 to the TMI-2 license and defined in detail in the PDMS TER, were applicable to the condition and control of the reactor. As the cleanup progressed, the facility evolved through Mode 1 to Mode 3 with each mode providing a lessening of Technical Specification requirements. The TMI-2 facility is currently in Mode 3 (for a more detailed discussion of the TMI-2 modes, see Chapter 2 of the PDMS TER). A reduction in the number of technical specifications, including eliminating the need for criticality



monitoring and the presence of operators in the control room, accompanied the progression of TMI-2 into Mode 3.

The licensee's August 16, 1988, letter requested amendment of the facility license to a possession-only license. The letter requested other changes applicable to PDMS including the proposed Technical Specifications, as supported by the PDMS SAR. The PDMS SAR as amended, will serve the same function as a Final Safety Analysis Report that is required of all licensed reactor facilities. On July 20, 1981, the NRC issued an exemption to the requirements of 10 CFR Part 50.71(e) for License No. DPR-73. The exemption deleted the requirements to periodically update the TMI-2 FSAR and required the licensee to use system descriptions (SDs) and Technical Evaluation Reports (TERs) for documenting changes made to the facility during the cleanup at TMI-2. These documents were required to be updated annually. The licensee has proposed using the PDMS SAR as the licensing basis document for PDMS and will periodically update the PDMS SAR to reflect current plant conditions. (See proposed PDMS Technical Specification 6.8.1.3.b and PDMS SAR Section 3.1.1.56). The PDMS SAR (1) describes the current status of the plant after extensive decontamination, (2) performs a regulatory review of conformance of the TMI-2 facility to 10 CFR Part 50, (3) describes fuel removal activities and Special Nuclear Materials (SNM) accountability, (4) gives a report of the radiological status of the plant and radiological goals to be attained prior to entry into PDMS, (5) lists deactivated systems and facilities, (6) lists and describes operational systems and facilities, (7) identifies and quantifies routine and unanticipated releases during PDMS, and (8) iterates the proposed changes to the Technical Specifications to permit entry into PDMS. The NRC staff has provided comments and requested clarification from the licensee<sup>2</sup> on the PDMS SAR and on the proposed PDMS Technical Specifications. The PDMS SAR has been amended 15 times based on new information, responses to NRC staff's formal questions, and changes in specifications for the facility.

The licensee also submitted the Defueling Completion Report (DCR) which provides a detailed description of the measurements and calculations performed to assure that as much of the fuel as reasonably achievable had been removed (see PDMS TER Section 5.1) and that the potential for a nuclear criticality has been precluded during either normal or accident conditions.

Following mitigation of the accident and stabilization of the facility, the licensee's efforts have been focused largely on the removal and treatment of the accident-generated water, decontamination, and removal of the reactor fuel. The NRC has reviewed and inspected the licensee's cleanup activities and has acted upon license amendment requests where appropriate. In general, the licensee has maintained the facility in accordance with the applicable NRC requirements.

The NRC has held numerous meetings of the Advisory Panel for the Decontamination of TMI-2, which were open to the public, to discuss PDMS and revisions to the proposed PDMS Technical Specifications. On April 25, 1991, the NRC staff

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<sup>2</sup>Letters of January 3, 1989, July 4, 1989, August 22, 1989, March 2, 1990, and August 6, 1990.

published in the Federal Register a Notice of Consideration of Issuance of Amendment to Facility Operating License and Opportunity for Hearing for the requested amendment (56 FR 19128). On May 24, 1991, a request for hearing was filed by Eric Epstein, and that request is currently pending before the Atomic Safety Licensing Board.

### 3.0 EVALUATION

The licensee has requested a number of changes to License No. DPR-73 and the TMI-2 Technical Specifications. These requested changes would authorize the licensee to possess but not operate the facility, would permit the licensee to place the TMI-2 facility in Post-Defueling Monitored Storage, and would reduce requirements to those applicable to a non-operating and defueled reactor. Currently, the Technical Specifications consist of two parts, Appendix A pertains to the facility and Appendix B to the environment. The licensee proposes combining the two sections into one set of Technical Specifications. Also, the licensee has proposed placing the remaining surveillance requirements for PDMS, currently in the Recovery Operations Plan, back into the Technical Specifications.

Chapter 4 of the PDMS SAR, the DCR and its supplements, and Section 4.3 of the attached PDMS TER describe the defueling process and the measurement and calculational methods used to quantify the fuel remaining in the reactor vessel, the reactor building and in the AFHB. Estimates based on measurements, sample analyses, and visual observations indicate that no more than 1723 pounds (783 kilograms) of residual fuel (i.e.,  $UO_2$ ) remains in the facility. For purposes of this PDMS SAR, fuel is defined as  $UO_2$  (uranium dioxide). Core debris is a mixture of fuel, structural, and adsorber materials resulting from the accident at TMI-2 and the subsequent cleanup. Detailed information related to the distribution of residual fuel is provided in the DCR, the PDMS SAR, and the PDMS TER, Section 4.3. Residual fuel is primarily distributed as plated material on the internal surfaces of the reactor vessel and components, reactor coolant pipes, pressurizer, steam generators, and reactor coolant pumps; as solid and particulate material in the lower portions of the reactor vessel; and as particulate material in tanks, demineralizers, dead legs in the piping systems, and sludge in the reactor building basement and AFHB floor drains.

The staff reviewed the licensee's quantification of residual fuel (see PDMS TER Section 4.3). The staff conducted an independent verification, on an audit basis, of the licensee's estimates of fuel remaining at TMI-2 following the defueling effort, examined the potential for the licensee to have overlooked significant quantities of fuel, and conducted verification measurements of the fuel quantities remaining in selected areas of the facility. Based on the results of the reviews, the staff concluded that the licensee's analysis methodology ensures a conservative estimate.

The licensee's DCR describes the models and calculations used to calculate the safe fuel mass limit (SFML) (that quantity of fuel [i.e.,  $UO_2$ ] below which there would be no possibility of an accidental criticality). The staff determined the appropriate SFML inside the reactor vessel to be 205 pounds

(93 kilograms) of fuel (i.e.,  $UO_2$ ). A separate SFML of 305 pounds (140 kilograms) was established for fuel (i.e.,  $UO_2$ ) outside the reactor vessel (see Section 5.1 of the PDMS TER). As an operational limit the proposed PDMS Technical Specifications restrict the licensee to moving less than 90 pounds (42 kilograms) of fuel (i.e.,  $UO_2$ ). To move a quantity of fuel greater than 90 pounds (42 kilograms) requires a safety analysis and prior NRC approval.

The staff reviewed the models and calculations given in the DCR (as supplemented) and concluded that there is no potential for criticality in the fuel remaining anywhere in the TMI-2 facility during either normal or accident conditions. The conservatism built into the model and the additional safeguards contained in the requirements to remove as much water as possible from the vessel, and restrictions on deliberate fuel movement, would provide further assurance of safety.

The potential for the routine release of any significant quantity of radioactive material from TMI-2 during PDMS has been minimized by the removal of as much of the fuel and core debris as reasonably achievable and the decontamination of large sections of the reactor and AFHB surfaces, equipment and piping. Routine releases were calculated to be significantly below the quantity specified in 10 CFR Part 50, Appendix I for annual release to the environment.

Chapter 8 of the licensee's PDMS SAR evaluated seven potential accident scenarios that could occur during PDMS. The selection of accidents was based on a generic study of a PWR decommissioning following an accident. The accidents evaluated were: 1) vacuum canister failure; 2) accidental spraying of concentrated contamination with high pressure spray; 3) accidental cutting of contaminated pipe; 4) accidental break of contaminated pipe; 5) fire inside containment; 6) open penetration; and 7) the rupture and release of resins from the Makeup and Purification Demineralizers. Additionally, in PEIS Supplement 3, the staff identified three potential accidents resulting in an atmospheric release. These were 1) a fire in the stairwell/elevator structure, 2) the rupture of a HEPA filter during decontamination activities, and 3) the spill of decontamination solution in the reactor building.

The staff reviewed the types of activities that would be permitted during PDMS and the licensee's accident analyses and performed independent evaluations of eight potential accidents. These were: 1) vacuum canister failure, 2) high pressure spray of contamination, 3) cutting contaminated pipe, 4) break of contaminated pipe, 5) elevator/stairwell fire in containment, 6) D-rings fire in containment, 7) containment penetration failure and 8) the rupture and release of resins from Makeup and Purification Demineralizers. Although few activities are expected to be conducted during PDMS, routine surveillance, preventive maintenance and stabilization activities will occur, if migration of radioactive material is detected. For the most severe accident, the fire in the D-rings in containment with no operation of the ventilation system, the total body and bone dose to the maximally exposed individual at the site boundary is 49 and 51 mrem, respectively (PDMS TER Section 5.4). This is approximately 0.2 percent of the 10 CFR Part 100 limits. The staff reviews found that accident consequences for the defueled, non-operating condition at

TMI-2 are significantly reduced compared to past decontamination and defueling operations. The staff determined that, with the post-accident, inoperable and essentially defueled condition of TMI-2, the probability and consequences of previously analyzed accidents has been lessened due to the removal of the fuel, partial decontamination of the facility, and reduced level of activity that will be conducted during PDMS.

The staff reviewed the licensee's Defueling Completion Report (DCR) and the PDMS SAR. The following conclusions of this Safety Evaluation are based on the information in the licensee's reports and on the conclusions in the staff's PEIS Supplement No. 3 and the PDMS TER: 1) defueling of the reactor has been accomplished to the extent reasonably achievable, 2) all fuel and core debris which have been removed from the reactor and associated systems have been shipped offsite, 3) the results of analyses indicate that there is no potential for criticality in the fuel remaining in the TMI-2 facility during either normal or accident conditions, 4) remaining radioactive waste from the major TMI-2 decontamination activities has been shipped offsite or packaged and staged for shipment offsite, 5) radiation levels within the facility have been reduced such that plant monitoring, maintenance and inspections can be performed, 6) radiological surveillance of activities during PDMS will be conducted in accordance with the approved Offsite Dose Calculation Manual and in compliance with the regulatory requirements of 10 CFR Part 20 which will, with the approved Radiation Protection Plan, ensure adequate control of occupational exposure and protection of workers, 7) the surveillance program proposed by the licensee will adequately monitor the PDMS environmental protection systems, 8) the environmental monitoring activities for TMI-2 during PDMS, included in the TMI Site Radiological Environmental Monitoring Plan, will ensure adequate environmental surveillance and control, 9) fire prevention, detection, and control as specified by the approved Fire Protection Program Evaluation will assure adequate reduction of fire potential as well as detection and control during PDMS, and 10) the requirements delineated in the proposed Technical Specifications for PDMS provide assurance that the facility will be maintained in a safety condition that will not negatively impact the environment.

#### 4.0 PROPOSED CHANGES TO LICENSE DPR-73

The staff reviewed the proposed changes to the requirements of the license and the Technical Specifications for the TMI-2 facility. The staff determined that the changes to these requirements as proposed in the licensee's submittal of August 16, 1988, and supplements were acceptable for the post-accident, inoperable and essentially defueled condition of the facility. The proposed changes and evaluations of the changes are presented below:

1. Change: License DPR-73, title, delete "FACILITY OPERATING" and replace with "POSSESSION ONLY".

Evaluation: This license change removes the implication that the licensee is authorized to operate the facility. The staff finds this change acceptable considering the post-accident, inoperable, and essentially defueled condition of the facility.



2. Change: License DPR-73, paragraph 1.A. change "license" to "The Possession Only License".

Evaluation: This license change removes the implication that the licensee is authorized to operate the facility. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

3. Change: License DPR-73, paragraph 1.B. delete this entire paragraph.

Evaluation: This license change deletes reference that the construction of the Three Mile Island Nuclear Station, Unit 2 has been substantially completed in conformity with Construction Permit No. CPPR-66, etc. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

4. Change: License DPR-73, paragraph 1.C, delete "operate" and replace with "be maintained", add the following at the end of the sentence, "except for those exemptions from specific portions of the regulations, previously granted by the Commission, and still applicable;" and renumber this paragraph 1.B.

Evaluation: These license changes remove the licensee's authority to operate the facility, specifies management of the facility, and recognizes that exemptions to the regulations have been granted. The staff finds these changes acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

5. Change: License DPR-73, paragraph 1.D, delete "operating" and replace with "Possession Only" and renumber this paragraph 1.C.

Evaluation: This license change removes the implication that the licensee is authorized to operate the facility. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

6. Change: License DPR-73, paragraph 1.E, delete "operating" and replace with "Possession Only", and renumber this paragraph 1.D.

Evaluation: This license change removes the implication that the licensee is authorized to operate the facility. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

7. Change: License DPR-73, paragraph 1.F, delete "operating" and replace with "Possession Only", and renumber the paragraph 1.E.

Evaluation: This license change removes the implication that the licensee is authorized to operate the facility. The staff finds

this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

8. Change: License DPR-73, paragraph 1.G, change paragraph to 1.F.

Evaluation: This is an administrative change that improves the readability and clarity of the license. The staff finds this change acceptable.

9. Change: License DPR-73, paragraph 1.H, delete "operating" and replace with "Possession Only", and renumber this paragraph 1.G.

Evaluation: This change removes the implication that the licensee is authorized to operate the facility. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

10. Change: License DPR-73, paragraph 1.I, delete "Facility Operating" and replace with "Possession Only," renumber this paragraph 1.H, and delete "Appendix D to 10 CFR Part 50 (currently known as 10 CFR Part 51)" and replace with "10 CFR Part 51."

Evaluation: The initial change removes the implication that the licensee is authorized to operate the facility. In addition, these changes improve the readability and clarity of the license and reflects current NRC regulations. The staff finds these changes acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

11. Change: License DPR-73, paragraph 1.J, delete "The receipt, possession, and use of source, byproduct and special nuclear material" and replace with "The possession of byproduct and special nuclear material and receipt, possession, and use of source material". Replace "this license" with "the license." Renumber this paragraph to 1.I.

Evaluation: This change eliminates authority to receive and use byproduct or special nuclear materials to reflect the post-accident, inoperable and essentially defueled condition of the facility during PDMS. The staff finds this change acceptable.

12. Change: License DPR-73, paragraph 2., delete "Pursuant to the Initial Decision of the Atomic Safety and Licensing Board dated December 19, 1977, and the amendment dated December 1, 1981, Facility Operating License No. DPR-73" and replace with "Possession Only License No. DPR-73."

Evaluation: This change removes requirements pertinent to the prior operating license for TMI-2 which are not applicable to the POL or PDMS. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

13. Change: License DPR-73, paragraph 2.A, delete "a pressurized water nuclear reactor and associated equipment" with no replacement and replace "operated" with "maintained".

Evaluation: This change removes reference to operation. The staff finds this administrative change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

14. Change: License DPR-73, paragraph 2.A, delete "Final Safety Analysis Report" as supplemented and amended (Amendments 17 through 62)" and replace with "Post-Defueling Monitored Storage Safety Analysis Report" as supplemented and amended".

Evaluation: This change provides the correct reference for the document that contains the licensee's description of PDMS. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

15. Change: License DPR-73, paragraph 2.B.(1), delete "use, and" and replace with "but not", insert the word "Domestic" before the word "Licensing".

Evaluation: This license change specifies that the licensee is not to operate the reactor and improves the clarity of the license. The staff finds these changes acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

16. Change: License DPR-73, paragraph 2.B.(3), delete " GPU Nuclear Corporation, pursuant to the Act and 10 CFR Part 70, to receive, possess and use at any time special nuclear material as reactor fuel, in accordance with the limitations for storage and amounts required for reactor operation, as described in the Final Safety Analysis Report, as supplemented and amended;"

Evaluation: This license change removes the licensee's authorization to possess and use special nuclear material as reactor fuel. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

17. Change: License DPR-73, paragraph 2.B.(4), delete "byproduct, source and special nuclear material as sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required;" and replace with "sealed sources for radiation monitoring equipment calibration;" Renumber as 2.B(3).

Evaluation: This license change removes the licensee's authorization to possess and use radioactive material sources only required for reactor startup and operation and only permits



possession of sealed sources for radiation monitoring equipment calibration. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

18. Change: License DPR-73, paragraph 2.B(5), renumber paragraph to 2.B(4).

Evaluation: This is an administrative change that improves the readability and clarity of the license. The staff finds this change acceptable.

19. Change: License DPR-73, paragraph 2.B.(6), add "40" to the 10 CFR Parts and delete "as may be produced by the operation of the facility." and replace with "which remain at the facility subsequent to the cleanup following the March 28, 1979, accident." Renumber as 2.B (5).

Evaluation: This license change removes the licensee's authorization to possess and use radioactive material produced by reactor operation and authorizes the licensee to possess radioactive material which may remain in the facility after the cleanup activities. The staff finds this change acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

20. Change: License DPR-73, paragraph 2.C., delete after "10 CFR Chapter I" through "Section 70.32 of Part 70", add after "rules, regulations" the following phrase in parenthesis "(except for those exemptions from specific portions of the regulations, previously granted by the Commission, and still applicable)".

Evaluation: 10 CFR Chapter I includes all previously listed sections. The proposed change also recognizes that exemptions to the regulations have been granted. The staff finds this change acceptable since it eliminates redundancy and improves clarity.

21. Change: License DPR-73, paragraph 2.C. Following the phrase, "incorporated below"; delete the remaining sections of part C and replace it with:

"(1) Technical Specifications

The Technical Specifications contained in Appendix A as revised through Amendment No. \_\_, are hereby incorporated in the license. The licensee shall maintain the facility in accordance with the Technical Specifications and all Commission Orders issued subsequent to the date of this Possession Only License.

Evaluation: This license change removes requirements related to operation of the facility such as maximum power level, number of coolant pumps required operational, Reactor Protection System and Engineered Safeguards Features instrument information,



modifications required for startup following the first refueling, and safe shutdown analyses. The staff finds these changes acceptable considering the post-accident, inoperable and essentially defueled condition of the facility.

Further, since the plant is essentially defueled and is not to operate, there are no safety systems nor safe shutdown systems for the facility. Thus, controls and modifications to assure protection of safety systems and safe shutdown systems are not necessary."

22. Change: License DPR-73, paragraph 2.D., renumber as 2.C.(2), delete this paragraph in its entirety and replace with:

"2.C.(2) Physical Protection

The licensee shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The licensee maintains combined site physical security, guard training and qualification, and safeguards contingency plans with Unit 1. These plans are administered under TMI-1 license condition 2.C.(3), and shall apply to TMI-2."

Evaluation: This license change removes the specific references for the Commission-approved physical security, guard training and qualification, and safeguards contingency plans from the TMI-2 license and states that the licensee now maintains a site security program that is administered under the TMI-1 license. The proposed change does not eliminate the requirements for a Commission-approved program for TMI-2 but transfers the specifics of that program to the TMI-1 license. The staff finds the proposed change acceptable.

23. Change: License DPR-73, paragraph 2.E., delete this paragraph in its entirety.

Evaluation: This license change removes specific conditions added to the license for protection of the environment such as environmental evaluation prior to additional construction or operational activities and the processing of intermediate-level waste water through the EPICOR-II system. The requirement for an environmental evaluation for construction activities is contained in 10 CFR Part 51 and no construction activities are permitted at the TMI-2 site during PDMS. The requirements for processing of all waste waters are provided in Amendment 35 issued September 11, 1989, for the disposal of the Accident Generated Water. Therefore, the staff finds that these changes are acceptable.

24. Change: License DPR-73, paragraph 2.F., delete this paragraph in its entirety.

Evaluation: This license change removes the specific requirement that this license be subject to the outcome of certain Federal court rulings. The staff finds this license change acceptable because the court ruling pertains to operating reactors and TMI-2 is a defueled, non-operating reactor.

25. Change: License DPR-73, add paragraph 2.D.; "Prior to terminating continuous operation of the auxiliary and fuel handling building (AFHB) ventilation systems, the special monitoring program of AFHB airborne levels shall be completed. The program shall include at least one year of data prior to entry into PDMS and at least one year of data after entry into PDMS. A report shall be submitted to the NRC containing the results of the program and containing sufficient data and analyses to demonstrate that the release rate of particulates with half-lives greater than eight days from the AFHB will be less than  $0.00024 \mu\text{Ci/sec}$  when averaged over any calendar quarter. Not included in the calculation of particulate release rate shall be those periods of time (designated in advance) prior to entry into PDMS during which aggressive defueling operations were performed in preparation for PDMS. The report shall be submitted to the NRC staff at least 60 days prior to terminating continuous operation of the AFHB ventilation system."

Evaluation: Since the AFHB is not a sealed containment structure and since the effluent from the AFHB, when not being actively ventilated, will not be monitored, the licensee shall demonstrate that the maximum potential release rate from the AFHB of particulate radionuclides with half-lives greater than eight days is a small fraction of the 10 CFR Part 50, Appendix I design objectives. The staff finds this change acceptable.

26. Change: License DPR-73, add paragraph 2.E.; "Prior to entry of the facility into PDMS, the licensee will develop an NRC approved surveillance requirement for the reactor building unfiltered leak rate test that, upon staff approval, will be incorporated as Section 4.1.1.2 of the proposed PDMS Technical Specifications."

Evaluation: Since reactor building isolation is required to ensure containment and control of the major source of radioactive material at TMI-2, an NRC approved leak rate test is required to ensure that the HEPA filtered breather remains the most likely leak path from the reactor building. The staff finds this requirement acceptable.

27. Change: License DPR-73, add paragraph 2.F.; "Additional Submittals Prior to Post-Defueling Monitored Storage: Prior to entry of the facility into Post-Defueling Monitored Storage, the licensee will submit and implement a Site Flood Protection Plan, a site Radiation Protection Plan, an Offsite Dose Calculation Manual, a Post-Defueling Monitored Storage Fire Protection Program Evaluation, a Post-Defueling Monitored

Storage Quality Assurance Plan, and a Radiological Environmental Monitoring Plan. Additionally, the licensee will submit to the NRC the results of the completed plant radiation and contamination surveys prior to entry into PDMS."

Evaluation: Many of the surveillance and requirements necessary for PDMS are specified in the cited documents. Thus, the documents must be submitted and the requirements implemented for entry into PDMS. The staff finds this requirement acceptable.

28. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.2, Recovery Operations Plan, delete the entire paragraph and replace with "1.2 Post-Defueling Monitored Storage (PDMS) is that condition where TMI-2 defueling has been completed, the core debris removed from the reactor during the cleanup period has been shipped off-site and the facility has been placed in a stable, safe, and secure condition."

Evaluation: This proposed Technical Specification change deletes the definition of the Recovery Operations Plan and instead provides the definition of the status of the facility when the facility is ready for entry into PDMS. The staff finds this change acceptable, since the Recovery Operations Plan is no longer necessary because the surveillance requirements contained in the Recovery Operations Plan will be incorporated in the proposed PDMS Technical Specifications.

29. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.3 FACILITY MODE, delete the entire paragraph.

Evaluation: This change removes the definition of FACILITY MODE (see Chapter 2 of the PDMS TER for an explanation of FACILITY MODEs). Because of the post-accident, inoperable and essentially defueled condition of the facility, the use of MODEs will be discontinued at the start of PDMS, the staff finds this change acceptable.

30. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.4, Change the identification of this paragraph to 1.3.

Evaluation: This is a format change only and improves the clarity and readability of the document. The staff finds this change acceptable.

31. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.5, Delete ". Implicit in this definition shall be the assumption that all necessary attendant instrumentation, controls, normal and emergency electrical power sources, "and replace with "and when all necessary attendant instrumentation, controls, electrical power,". Change the identification of this paragraph to 1.4.

Evaluation: This change alters the definition of operability by deleting reference to the requirement for emergency electric power sources during PDMS. During PDMS, electrical power will not be required to safely shut down the plant or mitigate the consequences of an accident. The plant is already shut down and the analysis of potential accidents does not require the use of emergency electric power sources to stay within the regulatory limits for radioactive releases (see PDMS TER Section 6.6.1). Because of the post-accident, inoperable and essentially defueled condition of the facility, there are no active safety systems requiring emergency power during PDMS. The staff finds this change acceptable.

32. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.6, Change title from "REPORTABLE EVENT" to "REPORTABLE EVENTS"; the paragraph on Reportable Events is renumbered 1.13.

Evaluation: This is a format change only and improves the clarity and readability. The staff finds this change acceptable.

33. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.7, delete the entire paragraph related to Containment Integrity.

Evaluation: Containment Integrity was applicable only to Mode 1. The licensee is currently in Mode 3 (see Chapter 2 of the PDMS TER for an explanation of facility modes). Therefore, this definition refers to a requirement that no longer exists, is not applicable to PDMS and can be deleted. The staff finds this change acceptable.

34. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.8, renumber the existing paragraph as 1.5 and replace it with "An instrument CHANNEL CALIBRATION is a test, and adjustment, as necessary, to establish that the channel output responds with acceptable range and accuracy to known values of the parameter which the channel measures or an accurate simulation of these values. CHANNEL CALIBRATION shall encompass the entire channel including equipment activation, alarm or trip, and shall be deemed to include the CHANNEL FUNCTIONAL TEST."

Evaluation: The licensee is updating the definition of CHANNEL CALIBRATION to be consistent with the standard Technical Specification definition. The staff finds this change adds to the clarity of the Technical Specifications and is acceptable.

35. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.9, renumber this paragraph 1.6.

Evaluation: This is a format change only and improves the clarity and readability of the document. The staff finds this change acceptable.



36. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.10, delete existing paragraph and replace with "1.7 A CHANNEL FUNCTIONAL TEST shall be 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."

Evaluation: The licensee is updating the definition of CHANNEL FUNCTIONAL TEST to be consistent with the standard Technical Specifications definition. The staff finds this change acceptable.

37. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.11, renumber this paragraph as 1.14.

Evaluation: This is a format change only and improves the clarity and readability of the document. The staff finds this change acceptable.

38. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.12, change the number of the paragraph from 1.12 to 1.8 and the Table number from 1.2 to 1.1.

Evaluation: This is a format change only and improves the clarity and readability of the document. The staff finds this change acceptable.

39. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.13, delete this entire paragraph.

Evaluation: This change removes the definition of FIRE SUPPRESSION WATER SYSTEM because the Technical Specifications requirements for a fire suppression water system have been deleted. The fire protection program for TMI-2 during PDMS, described in the PDMS SAR (7.2.2), is specified in the Fire Protection Program Evaluation manual which is referenced in the PDMS TER (6.4.3). An approved Fire Protection Program Evaluation is required by proposed PDMS License condition 2.F (see item 27 above). This change implements NRC Generic Letter 88-12, dated August 1, 1988 entitled "Removal of Fire Protection Requirements from Technical Specifications." The staff finds this change acceptable.

40. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.14, delete this entire paragraph.

Evaluation: This change will remove the definition of REVIEW SIGNIFICANT which specified specific topics that formerly required review during the cleanup. The term "REVIEW SIGNIFICANT" is no longer used in the revised PDMS Technical Specifications, therefore defining the term is no longer necessary. The staff finds this change acceptable.

41. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.15, delete entire paragraph.

Evaluation: This change removes the definition of CORE ALTERATION, which is the movement or manipulation of any reactor component (including core debris or fuel [i.e.,  $UO_2$ ]) within the reactor pressure vessel with the head removed and fuel in the vessel. Due to the post-accident, inoperable and essentially defueled condition of the reactor, no CORE ALTERATION activities as would take place in an operating reactor can be conducted. There is a Technical Specification on Fuel Removal/Rearrangement (proposed Technical Specification 3.2.1.1) which is very explicit and needs no definition of terms. The staff finds this change acceptable.

42. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.16, delete entire paragraph.

Evaluation: Since the reactor has had approximately 99 percent of the fuel removed, decay heat generation is insignificant, therefore, technical specifications on decay heat removal are unnecessary. The staff finds this change acceptable.

43. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.17, change the number from 1.17 to 1.15.

Evaluation: This is a format change only and improves the clarity and readability of the document. The staff finds this change acceptable.

44. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.18, 1.19, and 1.20, delete these three paragraphs in their entirety.

Evaluation: The definitions of LICENSED OPERATOR, SENIOR LICENSED OPERATOR, and FUEL HANDLING SENIOR REACTOR OPERATOR are removed. Section 6.2.2 of the current Technical Specifications no longer requires Licensed Operator, Senior Licensed Operator, or Fuel Handling Senior Reactor Operator. These positions were required during defueling. The TMI-2 facility is currently in a post-accident, inoperable and essentially defueled condition. Since there is no fuel in the reactor and no reactor fuel on site to be handled, there is no need for requirements for NRC licensed operators or fuel handling personnel. Considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

45. Change: License DPR-73, Technical Specifications, Section 1, Definitions, 1.21, delete the entire paragraph and replace with:

"1.9 CONTAINMENT ISOLATION shall exist when:

- a. Each penetration is:
  - 1. Closed by a manual valve, a welded or bolted blind flange, a deactivated automatic valve secured in the closed position or other equivalent mechanical closure to provide isolation of each penetration, or
  - 2. Open and the pathway to the environment provided with a HEPA filter, or
  - 3. Open in accordance with approved procedures. Controls shall be implemented to minimize the time the penetration is allowed open and to specify the conditions for which the penetration is open. Penetrations shall be expeditiously closed upon completion of the conditions specified in the approved procedures, and
- b. The Equipment Hatch is closed and sealed, and
- c. Each Containment Airlock is operable pursuant to Technical Specification 3.1.1.3."

Evaluation: Changes modify the wording and add the provision for HEPA filtration of open penetrations. The wording changes do not reduce the quality of the CONTAINMENT ISOLATION or alter the intent of the Technical Specification. The provision for HEPA filtration of open penetrations permits installation of an atmospheric breather line without permitting an unfiltered release point. Considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

46. Change: License DPR-73, Technical Specifications, Section 1, Definitions, Table 1.1, delete this Table in its entirety.

Evaluation: Table 1.1 defines the conditions for Modes 1, 2 and 3 (see Chapter 2 of the PDMS TER for an explanation of facility modes). Since the reactor has been defueled to the extent reasonably achievable, fuel canisters containing core debris has been removed from the reactor building and from the site, and the facility is being placed in a defueled, non-operating monitored storage, the mode definitions will no longer be applicable to the facility. The staff finds this change acceptable.

47. Change: License DPR-73, Technical Specifications, Section 1, Definitions, Table 1.2, renumber the Table 1.1 and add "P Completed prior to each release."

Evaluation: The FREQUENCY NOTATION defined in the Table will be needed for surveillance, calibration and sampling activities. The addition of the FREQUENCY NOTATION "P" provides definition for sampling of batches prior to release. Renumbering of the table

is for clarity and readability. The staff finds this change acceptable.

48. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.10 A BATCH RELEASE is the discharge of a discrete volume."

Evaluation: The definition of a BATCH RELEASE is needed because the facility may be required to process, sample, and release discrete volumes of liquid effluent during PDMS. The staff finds this change acceptable.

49. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.11 A CONTINUOUS RELEASE is the discharge of a non-discrete volume, e.g., from a volume or system that has an input flow during the continuous release."

Evaluation: The definition of a CONTINUOUS RELEASE is needed because the facility may be required to process, monitor, and release continuous volumes of effluent during PDMS. The staff finds this change acceptable.

50. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.12 The OFF-SITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of off-site doses resulting from radioactive gaseous and liquid effluents, in the calculation of gaseous and liquid effluent monitoring alarm/trip set points, and in the conduct of the Radiological Environmental Monitoring Program. The ODCM shall also contain (1) the programs required by Section 6.7.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating and Semi-annual Radioactive Effluent Release Reports required by Specifications 6.8.1.1 and 6.8.1.2."

Evaluation: The OFF-SITE DOSE CALCULATION MANUAL will be expanded to include operability and calibration requirements for radiation monitors such as those in waste handling and packaging facility service, the EPICOR monitor, and the effluent monitors, HP-219 and HP-219A. Inclusion of these monitors in the ODCM is consistent with Generic Letter 89-01 dated January 31, 1989. The staff finds this change acceptable.

51. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.16 SUBSTANTIVE CHANGES are those which affect the activities associated with a document or the document's meaning or intent. Examples of non-substantive changes are : (1) correcting spelling; (2) adding (but not deleting) sign-off spaces; (3) blocking in notes, cautions, etc.; (4) changes in corporate and personnel titles which do not reassign responsibilities and which are not referenced in the PDMS Technical Specifications; and (5) changes in nomenclature or editorial changes which clearly do not change function, meaning or intent."



Evaluation: This change defines what is meant by a SUBSTANTIVE CHANGE to assure that appropriate reviews, authorizations, and approvals are provided for changes that substantially alter the meaning or intent of a document. The staff finds this change acceptable.

52. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.17 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the GPU System, GPU contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries."

Evaluation: This change provides a specific definition of MEMBER(S) OF THE PUBLIC to ensure that appropriate classifications are made for dose assessment and assignment and determination of applicable controls. The staff finds this change acceptable.

53. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.18 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by GPU Nuclear for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes."

Evaluation: This change provides a specific definition of UNRESTRICTED AREA in compliance with 10 CFR Part 20 to ensure that appropriate classifications and locations are identified for dose assessment and assignment and determination of applicable controls. The staff finds this change acceptable.

54. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.19 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by GPU Nuclear. The SITE BOUNDARY for gaseous and liquid effluents shall be as shown in ODCM."

Evaluation: This change provides a specific definition of SITE BOUNDARY in compliance with 10 CFR Part 20 to ensure that appropriate classifications and locations are identified for dose assessment and assignment and determination of applicable controls. The staff finds this change acceptable.

55. Change: License DPR-73, Technical Specifications, Section 1, Definitions, add "1.20 The NPDES PERMIT is the National Pollutant Discharge Elimination System (NPDES) Permit No. PA0009920, effective January 30, 1975, issued by the Environmental Protection Agency to Metropolitan Edison Company. This permit authorized Metropolitan Edison Company to discharge controlled waste water from TMI Nuclear Station into the waters of the Commonwealth of Pennsylvania."

Evaluation: This change adds the definition for NPDES Permit which is required as a result of combining Appendix A and Appendix B Technical Specifications into a single set of proposed PDMS Technical Specifications. The staff finds this change acceptable.

56. Change: License DPR-73, Technical Specifications, Section 2, title page, delete "and Limiting Safety System Settings."

Evaluation: This change revises the title page to indicate the contents of the Section. Since there are no Safety Systems required for the post-accident, inoperable and essentially-defueled condition of the facility during PDMS, no limiting safety system settings are necessary. The staff finds this change acceptable.

57. Change: License DPR-73, Technical Specifications, Section 2, Safety Limits, add after "....TMI-2" "during PDMS."

Evaluation: This change provides more specificity to the statement and improves clarity and consistency. The staff finds this change acceptable.

58. Change: License DPR-73, Technical Specifications, Section 3, Title Page. Delete the page in its entirety and replace with: "Section 3/4, Limiting Conditions for PDMS and Surveillance Requirements."

Evaluation: This change revises the numbering and title of the section to correctly identify its contents. This change was an administrative change to improve readability of the document and made as a result of combining the Technical Specifications into a document incorporating the requirements for a post-accident, inoperable and essentially defueled reactor facility. The staff finds this change acceptable.

59. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, Paragraph 3.0.1, delete "Operation" and "the FACILITY MODE" and replace with "PDMS" and "POST-DEFUELING MONITORED STORAGE", respectively.

Evaluation: This specification defines the applicability of each specification in terms of the condition of the facility, i.e., PDMS. Because of the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

60. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, Paragraph 3.0.2, delete "Operation" in line one and line four of the specification and replace with "PDMS" in each place.

Evaluation: This specification defines those conditions necessary to constitute compliance with the specifications in terms of the condition of the facility. Because of the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

61. Change: License DPR-73, Technical Specifications, Part 3, Limiting Conditions for Operation, Paragraph 3.0.3, delete "operation" in the first sentence and "Section 50.73 of 10 CFR 50" in the last sentence of the specification and replace them with "PDMS" and "10 CFR 50.73" respectively.

Evaluation: This specification delineates the ACTION to be taken for circumstances not directly provided for in the ACTION statements. Because of the post-accident, inoperable and essentially defueled condition of the facility, the change from "operation" to "PDMS" is appropriate. The editorial change in the method of referencing the Code of Federal Regulations is also acceptable.

62. Change: License DPR-73, Technical Specifications, Part 3, Limiting Conditions for Operation, 3.1, 3.1.1, 3.1.1.1, 3.1.1.2, 3.1.1.3, 3.1.1.4, delete these paragraphs in their entirety.

Evaluation: These proposed Technical Specifications are related to boric acid injection and boron concentration in water systems for reactivity control. Since the reactor has been defueled and criticality is not possible, reactivity control is not necessary (See PDMS TER, Section 5.1.4). Due to the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

63. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.3, 3.3.1, 3.3.1.1 delete these paragraphs.

Evaluation: This change removes the requirement for neutron monitoring instrumentation. Based on the results of the licensee's Defueling Completion Report and the subsequent NRC staff review and approval; the possibility of an inadvertent criticality is precluded at TMI-2 (see PDMS TER, Section 5.1.4). Therefore, neutron monitoring instrumentation is not required. The staff finds this change acceptable.

64. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.3.3, 3.3.3.1, delete these paragraphs.

Evaluation: This change will remove the current Technical Specification requirements for radiation monitoring instrumentation. Radiation measurement instrumentation availability, operability, calibration, and testing criteria and requirements for PDMS are included in the Off-site Dose Calculation Manual (ODCM) in accordance with Generic Letter 89-01 dated January 31,

1989. The Off-site Dose Calculation Manual is required by proposed PDMS Technical Specifications 6.7.4(b) (see item 144 below) and proposed PDMS license condition 2.F (see item 27 above). The staff finds this change acceptable.

65. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.3.3.4, 3.3.3.5, and 3.3.3.7, delete these paragraphs.

Evaluation: This change removes requirements related to meteorological, essential parameters, and chlorine detection instrumentation. These instrumentation systems are required for operating reactors to ensure detection of potentially hazardous conditions. For the post-accident, inoperable and essentially defueled condition of TMI-2, these instrument systems are not needed. The staff finds these changes acceptable.

66. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.3.3.8, delete this paragraph.

Evaluation: This change removes from the current Technical Specifications the requirement for fire detection instrumentation. The requirements for fire detection and suppression during PDMS are contained in the Fire Protection Program Evaluation document and in Section 7.2.2 of the PDMS SAR. Maintenance of an approved Fire Protection Program Evaluation prior to entry into PDMS is required by proposed PDMS license condition 2.F (see item 27, above). This change implements Generic Letter 88-12, dated August 2, 1988 entitled, "Removal of Fire Protection Requirements from Technical Specifications." The staff finds this change acceptable.

67. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.4, 3.4.1, 3.4.2, 3.4.9, 3.4.9.1, and 3.4.9.2, delete these paragraphs.

Evaluation: These changes will remove requirements for reactor vessel water level monitoring, reactor coolant temperature controls, and assurance that the reactor vessel is open to the reactor building atmosphere. During PDMS, the reactor vessel will be drained, the decay heat generated from the residual fuel will be negligible, and the reactor vessel will be covered but not sealed. Considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds these changes acceptable.

68. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.5 and 3.5.1, delete these paragraphs.

Evaluation: This change will remove the requirement for direct communications between the Control Room or the Command Center and personnel in the reactor building. Since there is no requirement



for Control Room staffing during PDMS, the staff finds this change acceptable.

69. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.6.1.1.a, 3.6.1.1.b, and Table 3.6.2, delete these sections.

Evaluation: These changes will remove requirements for primary containment integrity and deletion of the table listing penetrations without double isolation. Containment Integrity was applicable to only Mode 1 during defueling. The licensee is presently in Mode 3 and defueling is completed (see Chapter 2 of the PDMS TER for an explanation of Modes). Therefore, this requirement is no longer applicable. During PDMS, modifications to containment penetrations may be made as long as isolation is maintained. Technical Specifications for primary containment isolation are provided in the proposed PDMS Technical Specifications in paragraph 3.1.1.1 (see item 70 below). Listings of reactor containment penetrations, their function during PDMS and their isolation capabilities are provided in the PDMS SAR Section 7.2.1 and the PDMS TER Section 6.2.1. Based on the availability of appropriate information and controls in supporting documentation, the staff finds this change acceptable.

70. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.6.1.2, under Applicability delete "Modes 2 and 3" and replace with "PDMS", change the number from 3.6.1.2 to 3.1.1.1.

Evaluation: The current technical specification requires primary containment isolation only for Modes 2 and 3 (see Chapter 2 of the PDMS TER for an explanation of Modes). This change specifies that the Limiting Condition for Operation is applicable to PDMS. The licensee is currently in Mode 3. Since this proposed change extends the current requirement to PDMS, the staff finds this change acceptable.

71. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.6.1.3, delete the paragraph in its entirety.

Evaluation: This change removes the requirement for Containment Air Lock operability during Mode 1 defueling (see Chapter 2 of the PDMS TER for a description of modes). Since the reactor has been defueled and is no longer in Mode 1 and the requirements for containment airlock operability during other modes is contained in related Technical Specifications, the staff finds this change acceptable. Additional requirements during PDMS pertaining to airlocks are found in proposed Technical Specification 3.1.1.3 (item 73 below).

72. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.6.1.4 and 3.6.1.5, delete these paragraphs.

Evaluation: These changes remove the limitations on primary containment pressure and air temperature. The reactor has been defueled. The primary containment will be vented to the atmosphere and maintained at ambient pressure or ventilated using the building purge system. There are no significant sources of heat that would result in an increase in the ambient temperature inside containment. Therefore, there is no necessity for pressure or temperature limitations during PDMS. It is expected that pressure changes will closely follow ambient atmospheric pressure. Temperature will remain relatively stable due to the massive heat sink of the building and its contents. The staff finds these changes acceptable.

73. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.6.1.6, delete the following:

"3.6.1.6 Each Containment Air Lock shall be OPERABLE with at least one door closed unless otherwise specified per the criteria of Recovery Operations Plan Section 4.6.1.6.1.

APPLICABILITY: Modes 2 and 3."

and replace with:

"3.1.1.3 Each Containment Air Lock shall be OPERABLE with at least one door closed except when the air lock is being used for transit entry and exit in accordance with site-approved procedures.

APPLICABILITY: PDMS"

Evaluation: Normal entry and exit procedures require at least one door closed. Occasionally, items that exceed the internal dimensions of the air lock must be transported into and out of the reactor building necessitating opening both airlock doors. Procedures will minimize the amount of time both airlock doors are open. Considering the post-accident, inoperable and essentially defueled condition of the facility and the administrative controls for entry and exit during PDMS, the staff finds this change acceptable.

74. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.6.3, and 3.6.3.1, delete the paragraph in its entirety.

Evaluation: This change removes the requirements for operability of the Containment Purge Exhaust System. The Containment Purge Exhaust System will only be used when ventilation of primary containment is necessary, i.e., prior to a manned entry. No active continuous ventilation of the containment building is required. This is no longer a safety related system necessary to mitigate the consequences of an accident and limit offsite dose to within 10 CFR Part 100 limits considering the post-accident,

inoperable and essentially defueled condition of the facility. Normal containment atmospheric breathing will be by a filtered pathway to the AFHB. Specifications for operability of the Containment Purge Exhaust System and its components, for ventilation prior to a manned entry, are provided in the PDMS SAR (7.2.1.3). Thus, due to the limited applicability of the Containment Purge Exhaust System and delineation of requirements in other documentation, the staff finds this change acceptable.

75. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.7.6, delete the section in its entirety.

Evaluation: This change removes the requirements for flood protection from the current TMI-2 Technical Specifications. Flood protection measures for TMI-2 are found in the PDMS SAR (7.1.4). Since the site is shared with TMI-1 (an operating reactor), the Technical Specifications (Section 3.14.1) for TMI-1 require periodic monitoring of the dike around the island. In addition, the licensee is preparing a site flood protection plan that will be completed by late 1992 and prior to implementation of this amendment request (see proposed PDMS license condition 2.F [item 27 above]). The staff finds this change acceptable.

76. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.7.7 and 3.7.7.1 delete these paragraphs in their entirety.

Evaluation: This change removes the Control Room habitability requirements. There is no need to assure habitability of the control room for operator corrective and mitigative actions to ensure reactor safe shutdown. During PDMS, there is no requirement to staff the TMI-2 Control Room. The staff finds this change acceptable.

77. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.7.9, revise the section as follows: change the number from "3.7.9" to "3/4.5" and from "3.7.9.1" to "3.5.1"; add "3/4.5.1 Sealed Source Integrity;" change the reference in the first paragraph from "4.7.9.2" to "4.5.1.2"; and change the APPLICABILITY from "Modes 1, 2, and 3" to "PDMS". Change ACTION from "1. Either decontaminated or repaired or 2. disposed of in accordance with Commission Regulations." to "1. Either decontaminate or repair, or 2. dispose in accordance with Commission Regulations."

Evaluation: These changes identify the requirement as applying to PDMS and improve the clarity, readability and consistency of the document. The staff finds these changes acceptable.

78. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.7.10 (includes 3.7.10.1 and 3.7.10.4), delete this section in its entirety.

Evaluation: This change removes the specifications for fire suppression water systems and fire hose stations. Responsibility for site fire manual suppression has been transferred to the TMI-1 facility and associated Fire Protection Program Evaluation. This change is consistent with the staff position contained in NRC Generic Letter 88-12 dated August 2, 1988, which results in fire protection requirements in the technical specifications being transferred to the Fire Protection Program Evaluation. Proposed PDMS license condition 2-F (see item 27 above) requires implementation of an approved PDMS Fire Protection Program Evaluation prior to entry into PDMS. Specific commitments for TMI-2 fire protection systems and fire response are provided in the PDMS SAR (Section 7.2.2) and Fire Protection Program Evaluation. The staff finds this change acceptable.

79. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.8 (includes 3.8.1, 3.8.1.1, 3.8.2, 3.8.2.1, 3.8.2.1.1, 3.8.2.1.2, and 3.8.2.2.1), delete the section in its entirety.

Evaluation: This change removes electrical power system specifications applicable to Mode 1 (see Chapter 2 of the PDMS TER for a description of Modes). Since the plant is no longer in Mode 1, the specifications are not applicable to the post-accident, inoperable and essentially defueled condition of the facility. The staff finds this change acceptable.

80. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.9, 3.9.1, 3.9.2, 3.9.3 and 3.9.4, delete these sections in their entirety.

Evaluation: These changes remove radioactive waste storage specifications (spent fuel storage pool and transfer canal) applicable to Modes 1 and 2 (see Chapter 2 of the PDMS TER for a description of Modes). Since the plant is no longer in Modes 1 or 2, the specifications are not applicable to TMI-2 now or during PDMS. All canisters containing fuel and core debris and radioactive waste from major decontamination activities have been removed from the TMI-2 facility. The fuel pool and transfer canal will be drained and maintained dry after the Accident Generated Water disposition is completed. Consequently, no requirements for fuel pool or transfer canal water levels are needed. The staff finds these changes acceptable.

81. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.9.12.1 and 3.9.12.2, delete these sections in their entirety.

Evaluation: This change removes specifications for operability of the ventilation systems for the Fuel Handling Building and the Auxiliary Building. The licensee's commitments for maintenance and testing of these ventilation systems are provided in the PDMS



SAR (7.2.6.1 and 7.2.6.2). The license, as amended (proposed license condition 2.D, see item 25 above), will require that the licensee demonstrate that airborne concentrations within the AFHB during PDMS will not exceed a small percentage of release limits. The staff finds this change acceptable.

82. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.10.1, revise the section as follows: Renumber "3.10" with "3/4.3," renumber "3.10.1" with "3.3.1"; replace "2400" with "50,000"; replace "the following areas" with "reactor vessel"; delete sub-items a through e; replace "Mode 1" with "PDMS"; replace "Specification 3.10.1" with "Specification 3.3.1"; and replace "Specification 6.9.2" with "Specification 6.8.2".

Evaluation: Changes to this specification revised upward the load limit over the reactor vessel from 2400 lbs to 50,000 lbs. The requested change also deletes load limitations over the incora instrument seal table and guide tubes, deep end of transfer canal canisters and areas not previously analyzed. These changes reflect the requirements established to protect against potential reconfiguration of the core debris outside the analyzed geometries used in the Defueling Completion Report. (See Section 5.1.4 of the PDMS TER.) These changes also reflect the revised status of the facility, the reduced risk of accidents, and the estimated quantity of Special Nuclear Material (SNM) in the facility. The staff finds these changes acceptable.

83. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.10.2, delete this section in its entirety.

Evaluation: This change removes the specifications for load limits in the Fuel Handling Building. Since all the fuel canisters containing fuel and core debris have been removed from the TMI-2 facility and no reactor fuel remains in the Fuel Handling Building, no specifications are necessary. The staff finds this change acceptable.

84. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.1.1.2, add the following:

"3.1.1.2 The unfiltered leak rate from Containment with the RB Breather closed shall be less than 1/100 of the rate through the RB Breather.

APPLICABILITY: PDMS

ACTION: If the unfiltered leak rate from Containment with the RB Breather closed is greater than 1/100 of the rate through the RB Breather or if the trend indicates that the 1/100 value will be exceeded within 1 year, then:

- a. Identify the excessive leakage path;

- b. Make necessary repairs and/or adjustments;
- c. Perform an additional unfiltered leak rate test;  
and
- d. Prepare and submit a special report to the Commission pursuant to Specification 6.8.2 within the next 30 days."

Evaluation: This change adds specifications for an unfiltered leak rate test to ensure that the high-efficiency particulate air (HEPA) filtered reactor building breather continues to be the most probable leak path from the containment building. The staff finds this additional requirement acceptable because it provides a quantitative estimate of leak rate during PDMS.

85. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.2.1.1, add the following:

"3/4.2 REACTOR VESSEL FUEL

3/4.2.1 REACTOR VESSEL FUEL REMOVAL/REARRANGEMENT

LIMITING CONDITIONS FOR PDMS

- 3.2.1.1 No more than 42 kg of fuel (i.e.,  $UO_2$ ) may be removed from the Reactor Vessel without prior NRC approval.

APPLICABILITY: PDMS

ACTION:

When more than 42 kg of fuel has been removed from the Reactor Vessel, suspend all further fuel removal activities and submit a safety analysis to the NRC for approval of this activity and any further fuel removal activities."

Evaluation: This change establishes limitations for removal of fuel from the Reactor Vessel to ensure that accidental criticality is precluded. The staff has determined (PDMS TER 5.1) that the Safe Fuel Mass Limit (SFML) for fuel (i.e.,  $UO_2$ ) in the reactor vessel is 93 kilograms. To assure that criticality calculations remain valid and that the geometry of the remaining fuel remains as defined in the criticality calculations, the proposed PDMS Technical Specifications prohibit taking any action which would result in the movement of 45% of the SFML ( $93 \times 0.45 = 42$  kilograms) from the reactor vessel without specific prior approval of the NRC. The staff finds this change acceptable.

86. Change: License DPR-73, Technical Specifications, Section 3, Limiting Conditions for Operation, 3.2.1.2, add the following:

- "3.2.1.2 No more than 42 kg of fuel in the Reactor Vessel may be rearranged outside the geometries analyzed in the Defueling Completion Report without prior NRC approval.

APPLICABILITY: PDMS

ACTION:

When more than 42 kg of fuel in the Reactor Vessel has been rearranged, suspend all further fuel rearrangement activities and submit a safety analysis to the NRC for approval of this activity and any further fuel rearrangement activities. If an external event were to occur that could potentially cause more than 42 kg of fuel in the Reactor Vessel to be rearranged, a report will be submitted to the NRC detailing the findings of any investigation into that potential rearrangement."

Evaluation: This change establishes limitations for rearrangement of fuel in the Reactor Vessel to ensure that accidental criticality is precluded (see PDMS TER 5.1). The staff finds this change acceptable. See explanation in item 85 above.

87. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.0.1, delete the paragraph and replace it with:

"Surveillance Requirements shall be met during PDMS or other conditions specified for individual Limiting Conditions for PDMS unless otherwise stated in an individual Surveillance Requirement."

Evaluation: This change removes the reference to the Recovery Operations Plan and places the Surveillance Requirements for PDMS in the proposed PDMS Technical Specifications which provides clarity and consistency in the Technical Specifications. The staff finds this change acceptable. Succeeding items 88 through 111 similarly involve proposed changes to the current Recovery Operations Plan that will be incorporated in the proposed PDMS Technical Specifications.

88. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.0.2, in the first sentence delete "of the Recovery Operations Plan".

Evaluation: This change removes reference to the Recovery Operations Plan as related to Surveillance Requirements. Since the Recovery Operations Plan is not applicable to the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

89. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.0.3, delete the paragraph and replace it with the following:

"Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for PDMS. Exceptions to these requirements are stated in the individual Specifications. Surveillance Requirements do not have to be performed on inoperable equipment."

Evaluation: This change redefines the criteria for performance of a Surveillance Requirement to be more appropriate to the post-accident, inoperable and essentially defueled condition of the facility. The staff finds this change acceptable.

90. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.1, 4.1.1, 4.1.1.1, 4.1.1.2, 4.1.1.3, and 4.1.1.4. Delete these paragraphs in their entirety.

Evaluation: This change removes the surveillance requirements for assuring operability of systems for injection of borated cooling water for criticality control. Injection systems for borated cooling water are no longer needed for criticality control since the reactor has been defueled. The staff finds this change acceptable.

91. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.3, 4.3.1, 4.3.1.1, and Table 4.3-1. Delete these paragraphs and table.

Evaluation: This change removes the surveillance requirements for neutron monitoring instrumentation. Due to the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

92. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.3.3, 4.3.3.1, and Table 4.3-3. Delete these paragraphs and table.

Evaluation: This change removes the surveillance requirements for radiation monitoring instrumentation. Surveillance requirements for radiation measurement instrumentation testing are provided in the Offsite Dose Calculation Manual consistent with Generic Letter 89-01, dated January 31, 1989, and required by proposed PDMS Technical Specification 6.7.4.a (see item 144 below) and proposed license condition 2.F (see item 27 above). The staff finds this change acceptable.

93. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.3.3.4, 4.3.3.5, and 4.3.3.7. Delete these paragraphs and associated Tables 4.3-5 and 4.3-7.



Evaluation: This change removes the surveillance requirements for operating reactors for the meteorological instrumentation, the essential parameters monitoring instrumentation, and the chlorine detection system. The essential parameters monitoring instrumentation, and the chlorine detection systems were only required during defueling (Mode 1). The meteorological instrumentation was only required during Modes 1 and 2 (see Chapter 2 of the PDMS TER for an explanation of facility modes). The facility is currently in Mode 3 and these requirements are not applicable. The licensee's requested change deletes sections that are no longer applicable to a post-accident, inoperable and essentially defueled facility. The staff finds these changes acceptable.

94. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.3.3.8.1, 4.3.3.8.2, and 4.3.3.8.3. Delete these paragraphs and associated Table 4.3-11.

Evaluation: This change moves the surveillance requirements for fire detection instrumentation and circuits to the Fire Protection Program Evaluation document and Section 7.2.2. of the PDMS SAR. Maintenance of the fire protection program procedures is required in the Administrative Controls section (Section 6.7.1) of the proposed PDMS Technical Specifications. An approved Fire Protection Program Evaluation is required by proposed PDMS license condition 2.F (see item 27 above). This change is consistent with NRC Generic Letter 88-12, dated August 2, 1988, entitled "Removal of Fire Protection Requirements from Technical Specifications." The staff finds this change acceptable.

95. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.4, 4.4.2, 4.4.9, 4.4.9.1, 4.4.9.1.1, and 4.4.9.1.2. Delete these paragraphs and associated Table 4.3-8.

Evaluation: This change removes Surveillance Requirements for reactor vessel water level monitoring and reactor coolant system chemical parameters. Since the reactor has been defueled and the reactor vessel drained, these surveillance requirements are no longer needed. The staff finds this change acceptable.

96. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.5 and 4.5.1. Delete these paragraphs.

Evaluation: This change removes the surveillance requirement for verifying that communication channels are open between the Control Room or the Command Center and personnel in the Reactor Building and fuel handling building. Since the control room and command center are not staffed during PDMS and considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

97. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.6, 4.6.1, 4.6.1.1a, and 4.6.1.1b. Delete these paragraphs.

Evaluation: This change removes surveillance requirements for primary containment integrity, specifically for the daily verification that modified containment penetrations are closed by a valve, blind flange, or deactivated automatic valve secured in its position. Containment Integrity was applicable only to Mode 1 (see Chapter 2 of the PDMS TER for an explanation of facility modes). The licensee is no longer in Mode 1. This surveillance requirement is not applicable now or during PDMS and can be deleted. Surveillance requirements of primary containment isolation are given in proposed PDMS Technical Specifications Section 4.1.1.1. The staff finds this change acceptable.

98. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, Section 4.6.1.2. Delete the section and replace it with the following:

"4.1.1.1 Primary CONTAINMENT ISOLATION shall be verified quarterly with the following exceptions:

- a. Isolation valves that are locked closed shall be verified annually on a quarterly STAGGERED TEST BASIS. If a valve is found to be out of position, a check of all locked closed isolation valves shall be performed.
- b. An independent verification of all isolation valve position changes shall be performed.
- c. Bolted or welded blind flanges which form a containment isolation boundary will be visually inspected for signs of degradation and/or leakage every five years on an annual STAGGERED TEST BASIS. If a problem is discovered with a flange, a check of all bolted or welded blind flanges shall be performed. "

Evaluation: Verification of containment isolation is necessary to ensure the control of the radioactive material remaining in the reactor containment building. Considering the post-accident, inoperable and essentially defueled condition of the facility, the staff concludes that the revised Technical Specifications provide adequate assurance of containment isolation. Thus, the staff finds this change acceptable.

99. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.6.1.3 and 4.6.1.3.1. Delete these sections.

Evaluation: This change removes the surveillance requirement for Containment Air Lock operability during Mode 1 (see PDMS TER

Chapter 2 for an explanation of facility modes). The reactor has been defueled and is no longer in Mode 1. This surveillance requirement is not applicable now or during PDMS and can be deleted. Other requirements for Containment Air Lock surveillance are contained in proposed PDMS Technical Specification 3.1.1.3 (see item 73 above). The staff finds this change acceptable.

100. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.6.1.4a, 4.6.1.4b, and 4.6.1.5. Delete these sections.

Evaluation: These changes remove the surveillance requirements for primary containment pressure and air temperature. Since the reactor has been defueled and most containment systems deactivated, there is no significant source of heat within the containment. The containment will be passively vented to the atmosphere via the HEPA filtered breather line. Thus, there is no necessity to provide surveillance of the pressure and temperature instrumentation. The staff finds this change acceptable.

101. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.6.1.6 and 4.6.1.6.1. Delete these sections and replace them with the following:

"4.1.1.3 Each Containment Air Lock shall be demonstrated OPERABLE at least once per three months by performing a mechanical operability check of each Air Lock Door, including a visual inspection of the components and lubrication if necessary and by visually inspecting the door seals for significant degradation. When both Containment Air Lock doors are opened simultaneously, verify the following conditions:

- a. The capability exists to expeditiously close at least one Air Lock door;
- b. The Air Lock doors and Containment Purge are configured to restrict the outflow of air in accordance with site-approved procedures; and
- c. The Air Lock doors are cycled to ensure mechanical operability within seven days prior to opening both doors."

Evaluation: The licensee proposes deleting the seal leakage pressure test for the containment air lock doors. The containment will not be pressurized, and seal leakage will be measured under proposed PDMS Technical Specification 4.1.1.2 (see item 110 below). The remaining surveillance requirements (mechanical operability check and the containment unfiltered leak rate test) are adequate and in keeping with the post-accident, inoperable and essentially defueled condition of the facility. The staff finds these changes acceptable.

102. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.6.3 and 4.6.3-1. Delete these sections in their entirety.

Evaluation: This change removes the requirements for surveillance of the Containment Purge Exhaust System. The Containment Purge Exhaust system will only be used when ventilation of primary containment is necessary. This is no longer a safety related system necessary to mitigate the consequences of an accident and limit offsite dose to within 10 CFR Part 100 limits considering the post-accident, inoperable and essentially defueled condition of the facility. Specifications for operability of the system and its components are provided in the PDMS SAR 7.2.1.3. Thus, due to the limited applicability and delineation of requirements in other documentation, the staff finds this change acceptable.

103. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.7, 4.7.6, 4.7.6.1, 4.7.6.2 and 4.7.6.3. Delete these sections.

Evaluation: This change removes the requirements for surveillance for flood protection from the current TMI-2 Technical Specifications/Recovery Operations Plan. Since the site is shared with TMI-1 (an operating reactor), surveillance activities are common to both facilities and are contained in the Technical Specifications for TMI-1 (TMI-1 Technical Specification Section 3.14.1). Flood protection measures for TMI-2 are described in the PDMS SAR (Section 7.1.4). In addition, proposed PDMS license condition 2.F (see item 27 above) requires the licensee to have implemented a flood protection plant prior to entry into PDMS. The staff finds this change acceptable.

104. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.7.7 and 4.7.7.1. Delete these sections.

Evaluation: This change removes the requirements to survey the Control Room Emergency Air Cleanup System. Amendment 30, issued May 27, 1988, eliminated the requirement for licensed operators at TMI-2 once the licensee achieved Mode 2 (see Chapter 2 of the PDMS TER for an explanation of facility modes). The surveillance requirement is not applicable now or during PDMS and can be deleted. Considering the post-accident, inoperable and essentially defueled condition of the facility, there is no need to assure habitability of the control room for operator corrective and mitigative actions to ensure reactor safe shutdown. Also, during PDMS, the TMI-2 Control Room need not be staffed. The staff finds this change acceptable.

105. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, Section 4.7.9, revise the section as follows: delete the number "4.7.9," change the numbers from "4.7.9.1, 4.7.9.2, and 4.7.9.3" to 4.5.1.1, 4.5.1.2 and 4.5.1.3, respectively. The words



"Startup sources and" in (a) and (c) and "sealed startup source and" also in (c) shall be deleted.

Evaluation: This change deletes reference to startup sources, which are no longer present at the TMI-2 facility. The staff finds this change acceptable.

106. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.7.10. Delete sections 4.7.10, 4.7.10.1.1, 4.7.10.1.2, 4.7.10.1.3, 4.7.10.4 and corresponding Table 4.7-1.

Evaluation: This change removes the Surveillance Requirements for fire suppression systems including fire hose stations from the current TMI-2 Technical Specifications. The site fire suppression responsibilities have been delegated to TMI-1 (in the Fire Protection Program Evaluation). Fire detection capabilities and Surveillance Requirements for TMI-2 are provided in the PDMS SAR 7.2.2. Additionally, the licensee is required, under proposed PDMS license condition 2.F (see item 27 above) to have an NRC approved Fire Protection Program Evaluation prior to entry into PDMS. This change is consistent with NRC Generic Letter 88-12, dated August 2, 1988 entitled "Removal of Fire Protection Requirements from Technical Specifications." The staff finds this change acceptable.

107. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.8. Delete sections 4.8, 4.8.1, 4.8.1.1, 4.8.2, 4.8.2.1, 4.8.2.1.1, 4.8.2.1.2, 4.8.2.2.1, and 4.8.2.2.2.

Evaluation: This change removes the Surveillance Requirements for both AC and DC power for the facility. Considering the post-accident, inoperable and essentially defueled condition of the facility, and the fact that no active systems are required to assure safe shutdown of the facility or mitigate the consequences of an accident that might result in offsite dose exceeding 10 CFR Part 100 limits, loss of electrical power would have no effect on safety at the facility. The staff finds this change acceptable.

108. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.9, 4.9.1, 4.9.2, 4.9.3, and 4.9.4. Delete these sections.

Evaluation: This change removes the Surveillance Requirements for water level monitoring of the spent fuel pool and the fuel transfer canal. Since all canisters containing fuel and core debris have been removed from the TMI-2 site and the spent fuel pool and fuel transfer canal will be drained and maintained dry for the majority of PDMS, Surveillance Requirements for water level are not needed. The staff finds this change acceptable.

109. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, sections 4.9.12.1 and 4.9.12.2, delete these sections in their entirety.

Evaluation: This change removes the Surveillance Requirements for the Fuel Handling Building/Auxiliary Building Air Cleanup Systems. The licensee proposed deleting the requirement for operability of both the Fuel Handling Building and Auxiliary Building air cleanup systems. The staff has found the licensee's proposal acceptable (See item 81 above). These systems will remain operational with surveillance requirements for these systems given in the PDMS SAR 7.2.6.1 and 7.2.6.2. These systems are not safety related systems necessary to mitigate the consequences of an accident and limit offsite dose to within 10 CFR Part 100 limits. Considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

110. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.1.1.2.

Evaluation: The licensee is developing the surveillance requirements for the unfiltered leak rate test of the reactor building. The surveillance requirements are expected to be submitted to the NRC staff for review by early 1992. The requirement for an NRC approved surveillance program for this test is a PDMS license condition (See license condition 2E in item 26 above) and will require NRC staff approval and incorporation in the PDMS Technical Specifications prior to the facility entering PDMS. The staff finds that this future requirement when implemented will ensure adequate surveillance of the Reactor Building.

111. Change: License DPR-73, Recovery Operations Plan, Section 4, Surveillance Requirements, 4.2.1.1. and 4.2.1.2, add the following:

"4.2.1.1 None required as long as no fuel is removed from the Reactor Vessel.

4.2.1.2 None required as long as no fuel in the Reactor Vessel is rearranged."

Evaluation: A Limiting Condition for PDMS establishes specifications for removal and rearrangement of fuel from and within the reactor vessel. No Surveillance Requirements are needed unless fuel movement or rearrangement is performed. The staff finds this change acceptable.

112. Change: License DPR-73, Technical Specifications, Section 5, Design Features. Delete the entire section and replace with the following:

"5.0 DESIGN FEATURES

5.1 CONTAINMENT

#### CONFIGURATION

5.1.1 The Containment Building is a steel lined, reinforced concrete building of cylindrical shape, with a dome roof and having the following design features:

- a. Nominal inside diameter = 130 feet.
- b. Nominal inside height = 157 feet.
- c. Minimum thickness of concrete walls = 4 feet.
- d. Minimum thickness of concrete roof = 3.5 feet.
- e. Minimum thickness of concrete floor pad = 13.5 feet.
- f. Nominal thickness of steel liner = 1/2 inch.
- g. Net free volume =  $2.1 \times 10^6$  cubic feet.
- h. Design Pressure = 5.0 psig."

Evaluation: This change removes design features such as exclusion area, site boundary, and design temperature and consolidates the design features of the containment building into one section. The design features most important for ensuring containment and control of radioactive material at TMI-2 are those of the reactor containment building which are provided. The site exclusion area (current Technical Specification 5.5.1) and low population zone (current Technical Specification 5.1.2) are more appropriate for an operating facility. TMI-2 is essentially defueled and inoperable. No fission product release from the remaining core debris is expected, other than some potential, but insignificant airborne release of material. There is no accident scenario that would result in an offsite dose to the maximally exposed member of the public in excess of 25 rem to the whole body or a total radiation dose in excess of 300 rem to the thyroid from iodine exposure (see PDMS TER Section 5.4.13). Therefore, no exclusion zone or low population zone needs to be defined (10 CFR Part 100.11). These areas are identified in the TMI-1 Technical Specifications. The Site Boundary for gaseous effluents (current Technical Specifications 5.1.3) and the Site Boundary for liquid effluents (current Technical Specification 5.1.4) will be identified in the Offsite Dose Calculation Manual (see proposed PDMS Technical Specification 6.7.4 and item 144 below). Containment design pressure and temperature (current Technical Specification 5.2.2) are no longer applicable to TMI-2. The total water and steam volume of the reactor coolant system (current Technical Specification 5.4.2) is no longer appropriate since the system will be dewatered. Since the licensee proposed eliminating the requirement for maintaining the meteorological tower, the requirement for identifying the location of the meteorological



tower (current Technical Specification 5.5 and 5.5.1) can be eliminated. Considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds these changes acceptable.

113. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.1.1, delete the entire section and replace with the following:

"6.1.1 The Manager, TMI-2 Department is responsible for the management of overall unit operations at Unit 2 and shall delegate in writing the succession to this responsibility during absence."

Evaluation: This change establishes the responsibility for the facility during PDMS and provides clarification. The staff finds this change acceptable.

114. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.2.1, delete the entire section and replace with the following:

"6.2.1 The GPU Nuclear Corporation (GPUNC) organization for unit management and technical support shall be as in Section 10.5 of the PDMS SAR."

Evaluation: This change deletes the requirement to maintain a separate organization plan that defines, in part, the Corporate Organization. The proposed change transfers the requirement to maintain the current corporate organization to Section 10.5 of the PDMS SAR. This is consistent with past staff guidance contained in Generic Letter 88-06 dated March 22, 1988, directing licensees to remove organizational charts from Technical Specifications. The staff finds this change acceptable.

115. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.2.2 and Table 6.2-1, delete the entire section and Table and replace with the following:

"6.2.2 The unit organization shall be as described in Section 10.5 of the PDMS SAR and an individual qualified in radiation protection procedures shall be on site whenever Radioactive Waste Management activities are in progress."

Evaluation: This change removes the requirement to maintain a current diagram of unit organization in the Organizational Plan. The proposed change transfers the requirement to maintain current unit organization in Section 10.5 of the PDMS SAR. This is consistent with past staff guidance contained in Generic Letter 88-06, dated March 22, 1988, directing licensees to remove organizational charts from Technical Specifications. The staff finds the proposed change acceptable.



The change also removes all requirements from the current Technical Specifications for minimum shift crews and licensed operators at the facility. Licensed operators are no longer needed at TMI-2. Therefore, the staff finds the proposed change acceptable.

The licensee also proposes maintaining the requirement for an onsite individual qualified in radiation protection procedures whenever Radioactive Waste Management activities are in progress. The requirements for the site fire brigade are found in the Fire Protection Program Evaluation. Considering the post-accident, inoperable and essentially defueled condition of the facility, and that a reference is retained regarding organization requirements and administrative controls, the staff finds this change acceptable.

116. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.3.1, delete the second sentence and replace with "The requirements of ANSI N18.1-1971 that pertain to operator license qualifications for unit staff shall not apply."

Evaluation: This change removes the reference to Modes 2 and 3 and clarifies the wording (see Chapter 2 of the PDMS TER for an explanation of facility modes). The staff finds this change acceptable because during PDMS the mode of the facility is not relevant and operator license qualifications are not needed for a post-accident, inoperable and essentially defueled facility.

117. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.3.2, delete the paragraph and replace with the following:

"6.3.2 The management position responsible for radiological control or his deputy shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each Radiological Controls Technician in a responsible position shall meet or exceed the qualifications of ANSI N18.1-1971, paragraphs 4.5.2 or 4.3.2, or be formally qualified through an NRC-approved TMI Radiation Controls training program. All Radiological Controls Technicians will be qualified through training and examination in each area or specific task related to their radiological controls function prior to their performance of those tasks. "

Evaluation: This change clarifies the qualification requirements for personnel responsible for radiological control during PDMS to ensure consistency. The staff finds this change acceptable.

118. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.4.1 and 6.4.2, delete these paragraphs and replace with the following:

"6.4.1 A retraining and replacement training program for the unit staff shall be maintained and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977."

Evaluation: This change clarifies the training requirements which apply during PDMS. The change eliminates the requirement for a training program for the Fire Brigade from the current Technical Specifications. The requirement for Fire Brigade training is found in Section II, B.1 of the current Fire Protection Program Evaluation. The staff finds this change acceptable.

119. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1, delete the paragraph and replace with the following:

"The Vice President of each division within GPU Nuclear Corporation shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in Sections 6.5.1.1 through 6.5.1.7 within his functional area of responsibility as assigned in the GPUN Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above."

Evaluation: This change establishes and clarifies the responsibilities for technical review and control during PDMS. The staff finds this change acceptable.

120. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.1, replace "Technical Specification 6.8" with "Section 6.7", and in both the first and second sentences replace "changes" with "SUBSTANTIVE CHANGES", and "individual(s)/group" with "individual(s) or group". In the first sentence, replace "test" with "tests".

Evaluation: These changes improve the clarity and readability of the document. The staff finds these changes acceptable.

121. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.2, add the following:

"6.5.1.2 Proposed changes to the Technical Specifications shall be reviewed by a knowledgeable individual(s) or group other than the individual(s) or group who prepared the change."

Evaluation: This change establishes the requirement for independent review and evaluation of PDMS Technical Specification changes. The staff finds this change acceptable.

122. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.3, renumber the paragraph "6.5.1.4" and after components in the first sentence add "necessary to maintain the PDMS condition as described in the PDMS SAR".

Evaluation: This change ensures that the control applies to PDMS and provides clarity to the document. The staff finds this change acceptable.

123. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.4, renumber the paragraph 6.5.1.3 and change "individual(s)/group" to "individual(s) or group".

Evaluation: This change is a format change and provides clarity to the document. The staff finds this change acceptable.

124. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.5, delete the paragraph and replace with the following:

"6.5.1.5 Investigation of all violations of the Technical Specifications including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence, shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which performed the investigation."

Evaluation: This change removes the administrative controls related to the security plan from the TMI-2 license and establishes criteria for review of investigations of violations of Technical Specifications. The licensee maintains a combined physical security plan with TMI-1 (see TMI-2 license condition 2.C.(2)). Administrative control of the site security plan is specified by TMI-1 Technical Specification 6.5.1.8. The criteria for review of investigations of violations of Technical Specifications is appropriate. The staff finds this change acceptable.

125. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.6, delete the paragraph and replace with the following:

"6.5.1.6 All REPORTABLE EVENTS shall be reviewed by an individual/group other than the individual/group which prepared the report."

Evaluation: This change removes the administrative controls related to review of the emergency plan and establishes criteria for independent review of REPORTABLE EVENTS. The emergency planning for TMI-2 is incorporated in TMI-1 planning. Considering the post-accident, inoperable and essentially defueled condition of the facility, there are no events which could result in a release approaching the levels established in the Protective Action Guide. The criteria for independent review of REPORTABLE EVENTS is appropriate. The staff finds this change acceptable.

126. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.7, delete the paragraph in its entirety.

Evaluation: This change removes administrative controls related to review of the Recovery Operations Plan. Since the requirements of the Recovery Operations Plan no longer apply to the facility during PDMS, the staff finds this change acceptable.

127. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.8, renumber the paragraph "6.5.1.7", delete "6.5.1.1 through 6.5.1.7" and replace with "Sections 6.5.1.1 through 6.5.1.6"; and after the second sentence add "Individuals responsible for reviews considered under Sections 6.5.1.1 through 6.5.1.5 shall render determinations in writing with regard to whether or not 6.5.1.1 through 6.5.1.5 constitute an unreviewed safety question.

Evaluation: This change provides clarification and improves readability of the document. The staff finds this change acceptable.

128. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.9, delete the paragraph in its entirety.

Evaluation: This change removes administrative controls related to reviews of support division procedures at TMI-2. Since the support division will not exist during PDMS, elimination of this criteria is appropriate. The staff finds this change acceptable.

129. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.10, renumber this section 6.5.1.8; delete the paragraph and replace with the following:

"6.5.1.8 Written records of activities performed in accordance with Sections 6.5.1.1 through 6.5.1.7 shall be maintained in accordance with Section 6.9."

Evaluation: This is a format and numbering change to improve the clarity and readability of the document. The staff finds this change acceptable.

130. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.1.11, renumber this section 6.5.1.9; delete the paragraph and replace with the following:

"6.5.1.9 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS 3.1 of 1978 Section 4.6, or 4.4 for applicable disciplines, or have 7 years of appropriate experience in the field of his or her specialty. Credit toward experience will be given for advanced degrees on a one-to-one basis up to a maximum of two years. Responsible Technical Reviewers shall be designated in writing."



Evaluation: This change renumbers the paragraphs to provide consistency in the document and clarifies the responsibilities for technical reviewers. The staff finds this change acceptable.

131. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.1, delete the paragraph and replace with the following:

"6.5.2.1 The Vice President of each division within GPU Nuclear Corporation shall be responsible for ensuring the independent safety review of the subjects described in Section 6.5.2.5 within his assigned area of review responsibility, as assigned in the GPUN Review and Approval Matrix."

Evaluation: This change reflects the revised organization which will be in place during PDMS and assigns the responsibility for independent safety review. The staff finds this change acceptable.

132. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.2, delete the second sentence of the paragraph, and substitute "individual or group" for Individual/group" twice in the first sentence.

Evaluation: This change clarifies the responsibility for independent safety reviews during PDMS. The current Technical Specification requires that an independent safety review be conducted on those TMI-2 documents that are determined to be REVIEW SIGNIFICANT. The term REVIEW SIGNIFICANT was created for and is unique to TMI-2 and applicable during the TMI-2 cleanup. The requirement for independent review of documents is transferred to Section 6.5.2.5 of the proposed PDMS Technical Specifications (see item 135 below). Instead of identifying a category of documents that are REVIEW SIGNIFICANT, the actual document type is identified in the proposed PDMS Technical Specifications. The staff finds this change acceptable.

133. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.3 j, delete this item and renumber the following item.

Evaluation: This change removes administrative controls related to emergency plans, organization, procedures, and equipment. Rev. 3 to the Corporate Emergency Plan, dated April 10, 1990, combined the emergency action levels of both TMI-1 and TMI-2 once TMI-2 entered Mode 2 (see Chapter 2 of the PDMS TER for an explanation of facility modes). Since emergency response and actions for the site have been delegated to TMI-1 and considering the post-accident, inoperable and essentially defueled condition of the facility, the staff finds this change acceptable.

134. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.4, insert after the word utilized "as determined by the cognizant Vice President".

Evaluation: This change provides clarification as to what position is authorized to determine the need for consultants. The staff find this change acceptable.

135. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.5, delete this section in its entirety and replace with the following:

"6.5.2.5 The following subjects shall be independently reviewed by INDEPENDENT SAFETY REVIEWERS (ISRs) in the functionally assigned divisions:

- a. Written safety evaluations of changes in the facilities as described in the Safety Analysis Report, of changes in procedures as described in the Safety Analysis Report, and of tests or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). Such reviews need not be performed prior to implementation.
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(c). Matters of this kind shall be reviewed prior to submittal to the NRC.
- c. Proposed changes to Technical Specifications or license amendments shall be reviewed prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require reporting to the NRC in writing. 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.
- e. Written summaries of audit reports in the areas specified in Section 6.5.3.
- f. Any other matters involving the plant which a reviewer deems appropriate for consideration or which is referred to the independent reviewers."

134. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.4, insert after the word utilized "as determined by the cognizant Vice President".

Evaluation: This change provides clarification as to what position is authorized to determine the need for consultants. The staff find this change acceptable.

135. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.5, delete this section in its entirety and replace with the following:

"6.5.2.5 The following subjects shall be independently reviewed by INDEPENDENT SAFETY REVIEWERS (ISRs) in the functionally assigned divisions:

- a. Written safety evaluations of changes in the facilities as described in the Safety Analysis Report, of changes in procedures as described in the Safety Analysis Report, and of tests or experiments not described in the Safety Analysis Report, which are completed without prior NRC approval under the provisions of 10 CFR 50.59(a)(1). This review is to verify that such changes, tests, or experiments did not involve a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(a)(2). Such reviews need not be performed prior to implementation.
- b. Proposed changes in procedures, proposed changes in the facility, or proposed tests or experiments, any of which involves a change in the Technical Specifications or an unreviewed safety question as defined in 10 CFR 50.59(c). Matters of this kind shall be reviewed prior to submittal to the NRC.
- c. Proposed changes to Technical Specifications or license amendments shall be reviewed prior to submittal to the NRC for approval.
- d. Violations, deviations, and reportable events which require reporting to the NRC in writing. 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.
- e. Written summaries of audit reports in the areas specified in Section 6.5.3.
- f. Any other matters involving the plant which a reviewer deems appropriate for consideration or which is referred to the independent reviewers."

Evaluation: This change removes reference to the Safety Review Group (SRG) which no longer exists. The responsibilities of the Safety Review Group were assumed by the Independent Onsite Safety Review Group (IOSRG) on June 30, 1990. This change clarifies the independent reviewer requirements to reflect the organization and responsibilities established for PDMS. The Independent Onsite Safety Review Group requires independent safety review by Independent Safety Reviewers (ISRs). The staff finds this change acceptable.

136. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.6, delete the paragraph and replace with the following:

"QUALIFICATIONS

6.5.2.6 The ISRS shall either have a Bachelor's Degree in Engineering or the Physical Sciences and five years of professional level experience in the area being reviewed or have nine years of appropriate experience in the field of his or her specialty. An individual performing reviews may possess competence in more than one specialty area. Credit towards experience will be given for advanced degrees on a one-for-one basis up to a maximum of two years."

Evaluation: This change deletes the term REVIEW SIGNIFICANT (see item 40 above) and incorporates Section 6.5.2.8 of the current Technical Specifications in this section. There are also format changes to improve clarity and readability. The staff finds this changes acceptable.

137. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.7, delete "6.10" and replace with "6.9."

Evaluation: This change is a format revision to improve the clarity and readability of the document. The staff finds this change acceptable.

138. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.2.8, delete this section in its entirety.

Evaluation: This section is incorporated in its entirety in Section 6.5.2.6. The staff finds this administrative change acceptable.

139. Change: License DPR-73, Technical Specifications, Part 6, Administrative Controls, Section 6.5.3 and 6.5.3.1. Delete Section 6.5.3.1 in its entirety and replace with the following:



"6.5.3.1 Audits of unit activities shall be performed in accordance with the TMI-2 PDMS 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 of activities required by the PDMS QA Plan. The audit frequency shall be at least once per 24 months.
- c. The Radiation Protection Plan and applicable implementing procedures. The audit frequency shall be at least once per 12 months.
- d. The Fire Protection Program and implementing procedures at least once per 24 months.
- e. An independent fire protection and loss prevention program inspection and technical audit shall be performed annually utilizing either qualified licensee personnel or an outside fire protection firm.
- f. An inspection and audit of the fire protection and loss prevention program by an outside qualified fire consultant at intervals no greater than 3 years.
- g. The ODCM and implementing procedures at least once per 24 months.
- h. Any other area of unit operation considered appropriate by the Manager, TMI-2 Department or the Office of the President - GPUNC."

Evaluation: This change establishes the audit program for those programs and activities that will be in effect during PDMS. The proposed change deletes the requirement to perform audits on training and qualification program, the nonconformances and corrective actions program, and the emergency plan. The licensee has proposed adding audits on the Offsite Dose Calculation Manual (ODCM). The licensee also proposed some administrative changes to improve the clarity and readability of the specification. The deletion of the training and qualification program audit and the nonconformances and corrective actions audit reflect the change in the facility from one that is actively being cleaned up to a stored facility. The emergency plan audit is required by the Site emergency plan administered by TMI-1. The staff finds these changes acceptable.

140. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.3.2, in the first sentence delete

"either the SRG (until implementation of IOSRG) or the Independent Onsite Safety Review Group (upon its implementation)", and replace with "the IOSRG", delete the last sentence and add the following sentence:

"Upper management shall be informed in accordance with the TMI-2 PDMS QA Plan."

Evaluation: The Safety Review Group (SRG) is no longer in existence. Its function is performed by the Independent Onsite Safety Review Group (IOSRG). The requirement for IOSRG review of audits is removed from this section since it is redundant with the requirement of PDMS proposed Technical Specifications 6.5.4.3.a and 6.5.2.5.e. Adding the proposed sentence clarifies when documents are to be forwarded to management. The staff finds these changes acceptable.

141. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.4, and succeeding subsections 6.5.4.1, 6.5.4.1.1, 6.5.4.2, 6.5.4.2.1, 6.5.4.2.2., 6.5.4.3, 6.5.4.4, 6.5.4.5, 6.5.4.6, 6.5.4.7, and 6.5.4.8. Delete these sections in their entirety.

Evaluation: This change removes the administrative controls related to the Safety Review Group (SRG). Since the Safety Review Group no longer exists and has been replaced by an Independent Onsite Safety Review Group (IOSRG) with its attendant administrative controls contained in PDMS proposed Technical Specification 6.5.4, the staff finds this change acceptable.

142. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.5.5, renumber this section (as 6.5.4) and subsections and make the following changes: delete 6.5.5.1.1 in its entirety; in 6.5.5.2a delete "except for an additional position to support to TMI-2 activities"; in 6.5.5.3a delete the word "safety"; in 6.5.5.3c delete "Office of the Director, TMI-2" and replace with "Manager, TMI-2 Department"; and in 6.5.5.6 renumber "6.5.5.3" with "6.5.4.3 and replace "Office of the Director, TMI-2" with "Manager, TMI-2 Department".

Evaluation: These changes provide clarification of responsibilities and positions in place during PDMS and improves readability and consistency of the document. The staff finds these changes acceptable.

143. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.6, delete 6.6.1a, 6.6.1b, and 6.6.1c and replace with the following:

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

- b. Each REPORTABLE EVENT shall undergo an independent safety review pursuant to Specification 6.5.2.5 d."

Evaluation: This change reflects the revision in definitions and criteria during PDMS for REPORTABLE EVENTS and their investigations. The change also removes reference to the Safety Review Group (SRG) which has been superseded by the Independent Onsite Safety Review Group (IOSRG). The staff finds this change acceptable.

144. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.8, delete this section in its entirety and replace with the following:

"6.7 PROCEDURES AND PROGRAMS

6.7.1 Written procedures shall be established, implemented, and maintained for the activities necessary to maintain the PDMS condition as described in the PDMS SAR. Examples of these activities are:

- a. Technical Specification implementation.
- b. Radioactive waste management and shipment.
- c. Radiation Protection Plan implementation.
- d. Fire Protection Program implementation.
- e. Flood Protection Program implementation.

6.7.2 Each procedure required by Section 6.7.1, and SUBSTANTIVE CHANGES thereto, shall be reviewed and approved as described in Section 6.5.1 prior to implementation and shall be reviewed periodically as required by ANSI N18.7-1976.

6.7.3 Temporary changes to procedures in Section 6.7.1 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 responsible organization qualified in accordance with Section 6.5.1.9 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision; and
- c. The change is documented, reviewed and approved as described in Section 6.5.1 within 14 days of implementation.

6.7.4 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

1. Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,
2. Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2,
3. Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
4. Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
5. Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
6. Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31 day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
7. Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses



associated with 10 CFR Part 20, Appendix B, Table II, Column 1.

8. Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50.
9. Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

1. Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
2. A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of the census, and
3. Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring."

Evaluation: This change removes references and administrative controls related to programs (such as Recovery Operations Plan) no longer applicable to the post-accident, inoperable and essentially defueled condition of the facility. The proposed changes also establish administrative controls for radioactive effluent and radiological environmental monitoring programs during PDMS. The proposed changes to Section 6.7.3 are consistent with Standard Technical Specifications, Babcock and Wilcox Plants (NUREG-1430).

Additional information is provided in the PDMS SAR 7.2.4 and the PDMS TER Section 6.6.3. The staff finds this change acceptable.

145. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.9, renumber to 6.8. and make the following changes:

In current section 6.9.1 delete "submitted" in the second line and add this sentence after the first sentence "Some of the reporting requirements of Title 10, Code of Federal Regulations are repeated below" and renumber the section 6.8.1.

Add: "ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT

6.8.1.1 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

SEMIANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT

6.8.1.2 The Semiannual Radiological Effluent Release Report covering the operation of the unit during the previous 6 months of operation shall be submitted within 60 days after January 1 and July 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50."

Renumber 6.9.1.4 to 6.8.1.3; delete the number 6.9.1.5 and retain the narrative; in the renumbered 6.8.1.3a, replace "man rem" with "person-rem"; after e.g., delete "reactor operations and", "inservice inspection", and "(describe maintenance), waste processing, and refueling." Place next sentence in parentheses. Delete the existing 6.9.1.5b and replace with:

- "b. All changes made to the PDMS SAR during the previous calendar year.
- c. All changes, tests, or experiments meeting the requirements of 10 CFR 50.59."

Renumber 6.9.2 to 6.8.2.

Evaluation: These changes provide clarification and consistency to the document and improve readability. They delete sections and reports that are no longer required or have been completed and modify remaining reporting requirements consistent with current regulations. The staff finds these changes acceptable.

146. Change: License DRP-73, Technical Specifications, Section 6, Administrative Controls, add the following:

"6.8.3 NONROUTINE REPORTS

A report shall be submitted in the event that an Exceptional Occurrence as specified in Section 6.13 occurs. The report shall be submitted under one of the report schedules described below.

PROMPT REPORTS

6.8.3.1 Those events specified as prompt report occurrences shall be reported within 24 hours by telephone, telegraph, or facsimile transmission to the NRC followed by a written report to the NRC with 30 days.

THIRTY DAY EVENT REPORTS

6.8.3.2 Nonroutine events not requiring a prompt report as described in Subsection 6.8.3.1, shall be reported to the NRC either within 30 days of their occurrence or within the time limit specified by the reporting requirement of the corresponding certification or permit issued pursuant to Sections 401 or 402 of PL 92-500, the Federal Water Pollution Control Act (FWPCA) Amendment of 1972, whichever time duration following the nonroutine event shall result in the earlier submittal.

CONTENT OF NONROUTINE REPORTS

6.8.3.3 Written 30-day reports and, to the extent possible, the preliminary telephone, telegraph, or facsimile reports shall (a) describe, analyze, and evaluate the occurrence, including extent and magnitude of the impact, (b) describe the cause of the occurrence, and (c) indicate the corrective action (including any significant changes made in procedures) taken to preclude repetition of the occurrence and to prevent similar occurrences involving similar components or system."

Evaluation: These changes are administrative requirements necessary to implement sections of the proposed PDMS Technical Specifications. The staff finds these changes acceptable.

147. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.10, renumber to 6.9. and make the following changes:

In the current Technical Specifications 6.10.1 (PDMS proposed Technical Specifications 6.9.1) delete 6.10.1c.

In 6.10.2 (now 6.9.2) part e. delete "Specifications 6.8.1.a, b., c., and f." and replace with "Recovery Technical Specification 6.8.1 and PDMS Technical Specification 6.7.1"; part n. delete "performed pursuant to these" and replace with "previously required by the"; part o. after Operating add ", Recovery, or PDMS"; part q. delete "the SRG or by"; and add part "v. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL."

Evaluation: These changes delete redundant requirements, provide clarification to the document, and update the references to documents, programs and activities that will be in place during PDMS. The staff finds these changes acceptable.

148. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, Section 6.11, renumber to 6.10; Section 6.12 renumber to 6.11; and add the following Sections:

"6.12 OFFSITE DOSE CALCULATION MANUAL (ODCM)"

SUBSTANTIVE CHANGES to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.9.2 v. This documentation shall contain:
  1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
  2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by GPU Nuclear management.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Semiannual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented."



Evaluation: This change establishes documents directly applicable during PDMS and provides administrative controls for changes, reviews and reports related to them. The staff finds this change acceptable.

149. Change: License DPR-73, Technical Specifications, Section 6, Administrative Controls, add the following:

"6.13 EXCEPTIONAL OCCURRENCES

UNUSUAL OR IMPORTANT ENVIRONMENTAL EVENTS

6.13.1 Any occurrence of an unusual or important event that causes or could potentially cause significant environmental impact causally related with station operation shall be recorded and reported to the NRC per Subsection 6.8.3.1. The following are examples of such events: excessive bird impaction events on cooling tower structures or meteorological towers (i.e., more than 100 in any one day); onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills near or downstream of the site.

EXCEEDING LIMITS OF RELEVANT PERMITS

6.13.2 Any occurrence of exceeding the limits specified in relevant permits and certificates issued by other Federal and State agencies which are reportable to the agency which issued the permit shall be reported to the NRC in accordance with the provisions of Subsection 6.8.3.2. This requirement shall apply only to topics of National Environmental Protection Act (NEPA) concern within the requirements of the permits and certificates noted in Section 6.15.

6.14 STATE AND FEDERAL PERMITS AND CERTIFICATES

Section 401 of PL 92-500 requires any applicant for a Federal license or permit to conduct any activity which may result in any discharge into navigable waters to provide the licensing agency a certification from the State having jurisdiction that the discharge will comply with applicable provisions of Section 301, 302, 306, and 307 of the FWPCA. Section 401 of PL 92-500 further requires that any certification provided under this section shall set forth any effluent limitations and other limitations, and monitoring requirements necessary to assure that any applicant for a Federal license or permit will comply with the applicable limitations. Certifications provided in accordance with Section 401 set forth conditions on the Federal license or permit for which the certification is provided. Accordingly, the licensee shall comply with the requirements set forth in the 401 certification dated November 9, 1977 or its currently applicable revision, issued to the licensee by the Pennsylvania Department of Environmental Resources, which requires, among other things, that

the licensee comply with effluent limitations stipulated in the NPDES PERMIT.

Changes or additions to the required Federal and State permits and certificates for the protection of the environment noted in this subsection shall be reported to the NRC within 30 days. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Section 401 and 402 of PL 92-500, NRC shall be notified concurrently with the authorizing agency. The notification to the NRC shall include an evaluation of the environmental impact of the revised requirement, limit or value being sought.

If during NRC's review of the proposed change, it is determined that a potentially severe environmental impact could result from the change, the NRC will consult with the authorizing agency to determine the appropriate action to be taken."

Evaluation: These sections, with slight wording modifications, are transferred from Appendix B of the current Environmental Technical Specifications to the proposed PDMS Technical Specifications. These changes are administrative requirements necessary to implement sections of the proposed PDMS Technical Specifications. The staff finds these changes acceptable.

150. Change: License DPR-73, Environmental Technical Specifications, Appendix B, make the following changes: Sections 2.0, 2.1, 2.1.1, 2.1.2, 2.1.3, 3.2, 3.2.1, 3.2.2, 3.2.3 are reformatted and transferred to the Offsite Dose Calculation Manual consistent with the guidance of NRC Generic Letter 89-01. Sections 4.6, 4.6.1, 4.6.2, and 5.4 are renumbered 6.14, 6.14.1, 6.14.2, and 6.15, respectively, and are transferred to the proposed PDMS Technical Specifications. Sections 3.0, 3.1, 3.1.1, 3.1.2, 4.0, 4.1, 4.2, 4.3, 4.4, 4.5, 5.0, 5.1, 5.2, 5.3, 5.3.1, and 5.3.2 are section headings that contained studies or requirements that have been completed or deleted by previous amendments. Removal of the section headings does not change the licensee's requirements. Sections 1.0, 5.5, 5.5.1, 5.5.2, 5.5.3, 5.5.4, 5.5.5, 5.5.6, 5.6, 5.6.1, 5.7, 5.7.1, 5.7.2, and 5.8 are administrative requirements necessary to maintain the Appendix B Technical Specifications as a separate document. Sections 4.6 and 5.4 of the current technical specifications (6.14 and 6.15 of the proposed PDMS Technical Specifications), Section 5.6.2, 5.6.2a, 5.6.2b and 5.6.2c in the current technical specifications (6.8.3, 6.8.3.1, 6.8.3.2, and 6.8.3.3 of the proposed PDMS Technical Specifications) are administrative requirements necessary to implement sections of the proposed PDMS Technical Specifications and are renumbered and included in the proposed PDMS Technical Specifications.

Evaluation: Since both the radiological and non-radiological requirements are retained in either the Offsite Dose Calculation Manual

or the proposed PDMS Technical Specifications, the staff finds these changes acceptable.

151. Change: License DPR-73, Technical Specifications, delete the following list of headings and empty tables: 3.3.2, 3.4.1, 3.7.4, 3.7.10.2, 3.7.10.3, 3.7.11, Table 3.8-1, Table 3.8-2, 4.1.3, 4.1.3.1, 4.3.2, Table 4.3-2, 4.3.3.8.4, 4.4.1, 4.7.4, 4.7.4.1, 4.7.10.2, 4.7.10.3.1, 4.7.10.3.2, 4.7.11, 4.8.1.2, 4.8.1.3, 5.4.1, 6.5.1.2, 6.7, 6.8.2.2, 6.9.1.6, 6.9.1.7, 6.9.1.8, 6.9.1.9, and 6.9.1.10.

Evaluation: These sections and tables consist of headings with no associated text and empty tables. Since these sections and tables contain no specifications or requirements, they may be deleted. The staff finds these changes acceptable.

The staff has concluded that 1) the TMI-2 facility can safely be placed in long-term monitored storage and the facility configuration during storage under both routine and accident conditions will not result in impacts that exceed those identified in the staff's PEIS Supplement 3, 2) no credible accident for the TMI-2 facility in the defueled condition could result in the release of radioactive materials to the environment in quantities that would require protective actions for the public, and 3) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed defueled, non-operating monitored storage condition of the reactor. Therefore, the staff finds the proposed amendments to the license acceptable.

#### 5.0 STATE CONSULTATION

In accordance with the Commission's regulations, a representative of the Commonwealth of Pennsylvania was contacted on December 19, 1991 about the proposed issuance of the amendment. The Commonwealth of Pennsylvania had no comments on the proposed amendment at that time.

#### 6.0 ENVIRONMENTAL CONSIDERATION

Pursuant to 10 CFR Parts 51.20 and 51.92, an environmental impact statement, Supplement 3 of the Programmatic Environmental Impact Statement Related to Decontamination and Disposal of Radioactive Waste Resulting from March 28, 1979 Accident, Three Mile Island Nuclear Station, Unit 2 - Final Supplement Dealing with Post-Dealing Monitored Storage and Subsequent Cleanup (PEIS Final Supplement 3), was prepared and issued August 1989. That document concluded that the proposed PDMS of TMI-2 would not have a significant impact on the quality of the human environment.

The staff has prepared an Environmental Assessment in support of PDMS that evaluates the licensee's last 11 amendments to their PDMS SAR issued since the August 1989 PEIS Supplement 3 was prepared. The purpose of the evaluation was to determine if the PEIS Supplement 3 is still valid. The staff concluded in the Environmental Assessment that the licensee's proposal is still within the

scope of the impacts evaluated in PEIS Supplement 3 and will not have a significant impact.

#### 7.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that because the amendment does not involve a significant increase in the probability or consequences of accidents previously evaluated, or create the possibility of a new or different kind of accident from any accident previously evaluated, and does not involve a significant reduction in a margin of safety, the amendment does not involve a significant hazards consideration. The Commission finds that (1) there is reasonable assurance that the health and safety of the public will not be endangered by the proposed activities, and (2) such activities will be conducted in compliance with the Commission's regulations and (3) the issuance of this amendment will not be inimical to the common defense and security or the health and safety of the public.