



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 219 TO FACILITY OPERATING LICENSE NO. DPR-50

AMERGEN ENERGY COMPANY, LLC

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

DOCKET NO. 50-289

1.0 INTRODUCTION

By letter dated June 11, 1999, GPU Nuclear, Inc. (at that time the licensee) submitted a request for changes to the Three Mile Island Nuclear Station, Unit 1 (TMI-1), Facility Operating License No. DPR-50. Subsequently, the TMI-1 Facility Operating License was transferred to AmerGen Energy Company, LLC. The requested changes would revise the Appendix A Technical Specifications (TS) to reflect plant organizational title changes. Specifically, the title of "Director, Operations and Maintenance" would be changed to "Plant Manager," the title of "Shift Supervisor" would be changed to "Shift Manager," the title of "Shift Foreman" would be changed to "Control Room Supervisor," and the title of "Radiological Controls/Safety Director, TMI" would be changed to "Director-Radiological Health and Safety." Additionally, the title of "Industrial Safety and Health Manager" would be replaced by the phrase, "management position responsible for occupational safety."

2.0 EVALUATION

"Director, Operations and Maintenance, TMI" to "Plant Manager"

The licensee stated that the change reflects the addition of the "Plant Manager" position to the plant organization. This position and the position of "Director - Work Management" will replace the current position of "Director, Operations and Maintenance, TMI" and both positions will report directly to the TMI Unit 1 Vice President. The licensee stated that the "Plant Manager" will have responsibilities for safe operation of the plant consistent with the operational responsibilities of the "Director, Operations and Maintenance, TMI," which are currently described in the TMI-1 updated final safety analysis report (UFSAR). In addition, the licensee stated that the "Plant Manager" position is required to meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, "Standard for Selection and Training for Nuclear Power Plant Personnel," in accordance with the TMI-1 OQA (Operational Quality Assurance) Plan. The licensee has stated that the "Director - Work Management" will have the maintenance responsibilities currently held by the "Director, Operations and Maintenance, TMI" as described in the UFSAR and that this position will also be required to meet the qualification requirements of ANSI/ANS 3.1-1978 in accordance with the OQA Plan. The proposed TS changes only include the "Plant Manager" position and not the "Director-Work Management." The "Plant Manager" position is responsible and accountable for operating the plant safely and it is this position which now is included in the TSs for the operational requirements formerly associated with the "Director-Operations and Maintenance." Since the "Plant Manager" and "Director-Work

Management” qualifications, operational functions, and responsibilities are essentially the same as those currently held by the “Director, Operations and Maintenance, TMI,” this change is considered administrative in nature and is acceptable.

“Shift Supervisor” to “Shift Manager”

The licensee has stated that this proposed change reflects an organizational title change only and there are no substantive changes to this position as described in the UFSAR. Additionally, this change will not affect the minimum shift crew composition as required by TS Table 6.2-1. Therefore, this change is considered administrative in nature and is acceptable.

“Shift Foreman” to “Control Room Supervisor”

The licensee stated that this proposed change reflects an organizational title change only and there are no substantive changes to this position as described in the UFSAR. Additionally, this change will not affect the minimum shift crew composition as required by TS Table 6.2-1. Therefore, this change is considered administrative in nature and is acceptable.

“Radiological Controls/Safety Director, TMI” to “Director - Radiological Health and Safety”

The licensee stated that this proposed change reflects an organizational title change only and there are no substantive changes to this position as described in the UFSAR. The “Director - Radiological Health and Safety” position will continue to be responsible for the implementation of the Radiation Protection Plan and performance of ALARA (as low as reasonably achievable) reviews. Therefore, this change is considered administrative in nature and is acceptable.

“Industrial Safety and Health Manager” to “management position responsible for occupational safety”

The licensee has stated that the “Industrial Safety and Health Manager” title is being changed to “Manager Occupational Safety.” The licensee has stated that there are no substantive changes to functions, responsibility or authority associated with the change from that described in the TMI-1 UFSAR. The licensee has proposed a reference to the management position in lieu of using the position title, in order to preclude the possible need for future TS changes for title changes at this lower tier organizational level. The affected TS approval function for snubber accessibility will be maintained at the manager level. The generic “title” and defined responsibilities for this position meet the relevant criteria in NUREG-0800, Standard Review Plan, Section 13.1.1, “Management and Technical Support Organization,” and are therefore, acceptable.

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendment. The State official had no comments.

### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment relates to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, the amendments meet the eligibility criteria for categorical exclusion

set forth in 10CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### **5.0 CONCLUSION**

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: January 7, 2000