



GPU Nuclear, Inc.
Route 441 South
Post Office Box 480
Middletown, PA 17057-0480
Tel 717-944-7621

April 10, 2000
1920-00-20033

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: Saxton Nuclear Experimental Corporation Facility (SNEC)
Operating License No. DPR-4
Docket No. 50-146
Technical Specification Change Request No. 60

In accordance with 10 CFR 50.4(b)(1), please find enclosed Technical Specification Change Request (TSCR) No. 60.

GPU Nuclear requests that minor changes (mainly in titles) be made to Section 3.0 of the Technical Specifications to reflect the organizational and administrative controls that will exist following the sale of the Oyster Creek Nuclear Generating Station. These organizational and administrative controls were described in GPU Nuclear's presentation to NRC staff on January 21, 2000. A summary of the proposed changes is included as Attachment 1. The revised Technical Specification pages are provided as Attachment 2.

TSCR No. 60 has been reviewed pursuant to 10 CFR 50.91(a)(1) and an analysis supporting a determination of no significant safety hazards is included. Pursuant to 10 CFR 50.91(b), copies of this TSCR and supporting analysis, which indicates no significant hazards consideration is involved, have been provided to the designated representatives of the Commonwealth of Pennsylvania.

GPU Nuclear requests NRC review and approve this TSCR by June 15, 2000 with an effective date fifteen (15) days after transfer of the Oyster Creek License to AmerGen. If you have any questions or require additional information regarding this license amendment, please contact Mr. James Byrne at (717) 948-8461.

Sincerely,

A handwritten signature in black ink, appearing to read "G. A. Kuehn Jr.", written over a horizontal line.

G. A. Kuehn Jr.
Vice President SNEC &
Program Director, SNEC Facility

A001

Attachments: 1) Evaluation of Changes
2) Revised License and Technical Specification pages
3) Certificate of Service for License and Technical Specification Change Request No. 60

cc: Administrator, NRC Region I - Hubert J. Miller
NRC Project Manager, NRR - Alexander X. Adams
NRC Project Scientist, Region I - Thomas F. Dragoun
File: 00034

Attachment 1

Evaluation of Changes

I. Technical Specification Change Request (TSCR) No. 60

GPUN requests the following changed replacement pages be inserted into the existing Technical Specifications (TS):

Pages 6, 7, 9, 11, 12, 17 and 18.

II. Reason For Proposed Change

The GPU Nuclear corporate structure will change following the sale of the Oyster Creek Nuclear Generating Station. The post sale management structure will include the position of GPU Nuclear Cognizant Officer that will have overall responsibility for decommissioning the facility and will maintain final authority over facility decisions. The primary purpose of TSCR No. 60 is to incorporate those changes into the licensing basis. Accordingly, references to the President GPU NUCLEAR and division Vice President have been replaced with a reference to the GPU Nuclear Cognizant Officer. "Other GPU NUCLEAR personnel" has been replaced with "Other GPU Inc. personnel" and "Radiation Safety Committee" has been replaced with "TMI2/SNEC Oversight Committee." In addition, audits will continue to be conducted in accordance with approved Quality Assurance Plan procedures, however these procedures will be implemented by AmerGen or another qualified vendor. Therefore "GPU Nuclear audit program procedures" have been replaced with "approved Quality Assurance Plan procedures." Finally, with the recent NRC reorganization, the "Non-Power Reactors and Decommissioning Project Directorate Director no longer exists." This will be deleted from Technical Specifications.

III. Description of Change And Safety Evaluation Justifying Changes

Technical Specification 3.1.1 and 3.1.2 would be revised as follows:

Specification 3.1.1

"The ~~President~~ GPU NUCLEAR Cognizant Officer is responsible for and provides full-time dedicated staff for the purpose of conducting all activities safely and, effectively and in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications (TSs).

Specification 3.1.2

~~The Vice President Engineering Division assures that all division and corporate activities are performed in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications (TSs).~~"

Technical Specification 3.1.1 and 3.1.2 have been changed in two regards. The GPU Nuclear Cognizant Officer has been identified as being responsible for ensuring that the staffing

requirements are met. The staffing requirements and the staff's responsibilities are not impacted by the proposed change. Secondly, the former responsibilities of the Engineering Division Vice President specified in Technical Specification 3.1.2 have been incorporated into Technical Specification 3.1.1 and assigned to the GPU Nuclear Cognizant Officer. The requirements have not been eliminated, merely reassigned. Technical Specification 3.1.2 has been deleted and the remaining specifications have been renumbered accordingly.

Technical Specification 3.1.7 would be revised as follows:

“Other GPU Inc. NUCLEAR personnel provide SNEC facility management with technical support, project management capabilities and manpower.”

This change is an administrative change in Technical Specification 3.1.7 reflecting the fact that the GPU NUCLEAR Cognizant Officer will be able to obtain support from other GPU organizations as needed to perform activities at the facility. Technical Specification 3.1.7 has been renumbered to 3.1.6 because of the combination of Technical Specification 3.1.1 and 3.1.2.

Technical Specification 3.5.1.1 would be revised as follows:

“~~The Vice President of each division within GPU NUCLEAR supporting the SNEC facility decommissioning project shall be GPU NUCLEAR Cognizant Officer is~~ responsible for ensuring the preparation, review, and approval of documents required by the activities described in sections 3.5.1.2 through 3.5.1.7 ~~within his functional area.~~ Implementing approvals shall be performed at the cognizant manager level or above.”

This change is an administrative change in Technical Specification 3.5.1.1. The requirements for the preparation, review and approval of documents required by the activities described in sections 3.5.1.2 through 3.5.1.7 have not been changed. The GPU NUCLEAR Cognizant Officer has been designated as being responsible for ensuring that the requirements are met.

Technical Specification 3.5.2.1 would be revised as follows:

“~~The Vice President of each division within GPU NUCLEAR supporting the SNEC facility decommissioning project shall be GPU NUCLEAR Cognizant Officer is~~ responsible for ensuring the independent safety review of the subjects described in section 3.5.2.3. ~~within his assigned area of review responsibility.”~~

This change is an administrative change in Technical Specification 3.5.2.1. The requirements for performing independent safety reviews have not been changed. The GPU Nuclear Cognizant Officer has been designated as being responsible for ensuring the independent safety review of the subjects described in section 3.5.2.3.

Technical Specification 3.5.2.4 would be revised as follows:

“Consultants may be utilized as determined by the ~~cognizant Vice President GPU NUCLEAR Cognizant Officer~~ to provide expert advice.”

This change is an administrative change in Technical Specification 3.5.2.4. The ability to use consultants to provide expert advice has not been impacted. The use of consultants for providing expert advice will be determined by the GPU NUCLEAR Cognizant Officer.

Technical Specification 3.5.2.5 would be revised as follows:

“The following subjects shall be independently reviewed by Independent Safety Reviewers ~~in the functionally assigned divisions.~~”

This change is an administrative change in Technical Specification 3.5.2.5. The scope of subjects requiring and the requirements for performing an independent safety review have not changed. Removing the reference to divisions within the prior organization does not impact the ability to comply with the specification.

Technical Specification 3.5.4 would be revised as follows:

“The audit function is independent of the SNEC facility management. Audits shall be performed by qualified individuals, as a minimum, for those activities designated within the scope of the SNEC facility's Quality Assurance Program. Audits are generally conducted biennially, however, frequency is based on the level of activity at the SNEC facility. Audits may also be performed at the request of the GPU NUCLEAR Cognizant Officer ~~President~~. Audits are performed in accordance with ~~the GPU Nuclear audit program procedures approved~~ Quality Assurance Plan procedures. The audit procedures identify areas which may be included in the audit scope. Audit reports shall be forwarded to the GPU NUCLEAR Cognizant Officer ~~President~~ within 60 days of completion of the audit.”

This change is an administrative change in Technical Specification 3.5.4. Auditing requirements are not impacted by the change. Audits will continue to be conducted in accordance with approved Quality Assurance Plan procedures. These procedures will be implemented by AmerGen or another qualified vendor. As the current NRC license holder for TMI-1, AmerGen is well qualified to perform this service. The GPU NUCLEAR Cognizant Officer may request that audits be performed and will be the recipient of audit reports.

Technical Specification 3.5.5 would be revised as follows:

~~“Radiation Safety TMI-2/SNEC Oversight Committee”~~

This change is an administrative change in Technical Specification 3.5.5. The title of the committee has changed to reflect the revised GPU NUCLEAR structure. The responsibilities of the committee have not changed.

Technical Specification 3.5.5.1 would be revised as follows:

~~“The Radiation Safety TMI-2/SNEC Oversight Committee shall report to the Vice President Engineering GPU NUCLEAR Cognizant Officer. The Committee will consist of at least four members. Membership will be on the recommendation of the Vice President Engineering Committee Chairman and approval of the GPU NUCLEAR Cognizant Officer. Three members shall constitute a quorum.”~~

This change is an administrative change in Technical Specification 3.5.5.1. The title of the committee and the reporting chain has been changed to reflect the revised GPU NUCLEAR structure. The composition and quorum requirements for the committee have not changed. Committee membership will be on the recommendation of the Committee Chairman and approval of the GPU NUCLEAR Cognizant Officer. The responsibilities of the committee have not changed.

Technical Specification 3.5.5.4 would be revised as follows:

~~“Written minutes of all meetings shall be prepared and distributed to the GPU NUCLEAR Cognizant Officer Vice President Engineering within 30 days of the meeting date.”~~

This change is an administrative change in Technical Specification 3.5.5.4. The requirement for the preparation and distribution of minutes has not changed. The GPU NUCLEAR Cognizant Officer has been designated as a recipient of the minutes.

Technical Specification 3.8.1 and 3.8.2 would be revised as follows:

Specification 3.8.1

~~“A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or facsimile, the Non Power Reactors and Decommissioning Project Directorate Director, or designee and the NRC Operations Center, and shall submit a written follow-up report to the Document Control Desk and the Non Power Reactors and Decommissioning Project Directorate Director within 30 days, which describes the circumstances and the corrective action taken. These reports shall include:”~~

Specification 3.8.2

An annual report shall be submitted to the Document Control Desk ~~and the Non-Power Reactors and Decommissioning Project Directorate Director~~, within 6 months after the end of the calendar year, of the status of the deactivated facility including:

This change is an administrative change in Technical Specifications 3.8.1 and 3.8.2. With the recent NRC reorganization, the Non-Power Reactors and Decommissioning Project Directorate Director no longer exists. Notification will still be made to the NRC Operations Center with a written follow-up to the Document Control Desk.

IV. No Significant Hazards Consideration

GPUN has determined that Technical Specification Change Request No. 60 involves no significant hazard consideration as defined in 10 CFR 50.92.

1. The proposed changes to the SNEC Technical Specifications do not involve a significant increase in the probability of occurrence or consequences of an accident or malfunction of equipment important to safety previously analyzed in the safety analysis report. The changes have no impact on plant operations or the release of radioactive materials.
2. The proposed changes to the SNEC Technical Specifications will not create the possibility for an accident or malfunction of a different type than any previously evaluated in the safety analysis report because no plant configuration or operational changes are involved.
3. The changes will not involve a significant reduction in the margin of safety as defined in the basis for any technical specification for SNEC because no change to operational limits will be made.

V. Implementation

GPU Nuclear requests that the amendment authorizing TSCR No. 60 become effective fifteen (15) days after the transfer of the Oyster Creek License to AmerGen.

Attachment 2
Revised Technical Specification Pages

personnel positions, or in equivalent forms of documentation. These requirements shall be documented in the SNEC Facility USAR.

- 3.1.1 The GPU NUCLEAR Cognizant Officer is responsible for and provides full-time dedicated staff for the purpose of conducting all activities safely, effectively and in accordance with corporate policies, applicable laws, regulations, licenses and Technical Specifications (TSs).
- 3.1.2 The Program Director SNEC Facility is responsible for administration of all SNEC facility functions, for direction of all DECOMMISSIONING ACTIVITIES, and for assuring that the requirements of License No. DPR-4 and these TSs are implemented.
- 3.1.3 The SNEC Facility Site Supervisor provides on-site management and continuing oversight of PRODUCTION ACTIVITIES.
- 3.1.4 The Radiation Safety Officer (RSO) is responsible for the conduct and oversight of all SNEC radiation safety activities through implementation of the Radiation Protection Plan. All radiological controls personnel shall have stop work authority in matters relating to or impacting radiation safety.
- 3.1.5 The Group Radiological Controls Supervisor (GRCS) directly supervises radiation safety activities.
- 3.1.6 Other GPU Inc. personnel provide SNEC facility management with technical support, project management capabilities and manpower.

3.2 Facility Staffing Requirements:

- 3.2.1 At least two individuals, one of which must be knowledgeable in radiation monitoring and the radiological hazards associated with the facility, shall perform radiological surveys necessary to support the initial entry into the CV for the day.
- 3.2.2 The RSO or a GRCS shall be present on site whenever CV entry, PRODUCTION ACTIVITIES, maintenance, characterization and/or RADIOACTIVE WASTE MANAGEMENT ACTIVITIES are being performed in Radiologically Controlled Areas (RCA's).

3.3 Facility Staff Qualifications

3.3.1 Each Radiological Controls Technician/GRCS shall meet or exceed the qualifications of ANSI N18.1-1971, paragraph 4.5.2 and 4.3.2 respectively or shall be formally qualified through an NRC approved radiological controls training program.

3.3.2 All personnel performing decommissioning or associated activities shall be briefed on the SNEC site specific conditions and applicable requirements of the task assigned.

3.4 Training

GPU NUCLEAR shall maintain training programs as necessary for those personnel performing decommissioning work functions at the SNEC facility.

3.4.1 The job specific training or knowledge necessary to accomplish a specific task or project goal shall be dictated by the dismantlement or decommissioning work scope.

3.4.2 In lieu of training, performance of specialized tasks, techniques and equipment operation shall be permitted, provided competency is demonstrated to the Program Director SNEC Facility or his designee.

3.5 Review, Inspection and Audit

3.5.1 Technical Review

3.5.1.1 The GPU NUCLEAR Cognizant Officer is responsible for ensuring the preparation, review, and approval of documents required by the activities described in sections 3.5.1.2 through 3.5.1.7. Implementing approvals shall be performed at the cognizant manager level or above.

3.5.1.2 Each procedure required by section 3.6.1 and SUBSTANTIVE CHANGES thereto shall be prepared by a designated individual or group knowledgeable in the area of the affected procedure. Each procedure and substantive change thereto, shall be given a technical review by an individual or group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change.

- 3.5.1.10 Records of the review activities performed in accordance with 3.5.1.2 through 3.5.1.7 shall be maintained in accordance with section 3.9.
- 3.5.2 Independent Safety Review
- 3.5.2.1 The GPU NUCLEAR Cognizant Officer is responsible for ensuring the independent safety review of the subjects described in section 3.5.2.3.
- 3.5.2.2 Independent safety review shall be completed by an individual or group not having direct responsibility for the performance of activities under review, but who may be from the same functionally cognizant organization as the individual or group performing the original work.
- 3.5.2.3 GPU NUCLEAR shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:
- nuclear unit operations
 - electrical, mechanical and nuclear engineering
 - chemistry and radiochemistry
 - metallurgy
 - instrumentation and control
 - radiological safety
 - administrative controls and quality assurance practices
 - other appropriate fields such as radioactive waste management.
- 3.5.2.4 Consultants may be utilized as determined by the GPU NUCLEAR Cognizant Officer to provide expert advice.
- 3.5.2.5 The following subjects shall be independently reviewed by Independent Safety Reviewers:
- 3.5.2.5.1 Written safety evaluations of changes in the facility and changes of procedures 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

- a. Verification that EXCLUSION AREA access points are SECURED at the completion of each authorized entry.
- b. Verification of the OPERABILITY of the EXCLUSION AREA intrusion alarms shall be performed quarterly.
- c. The station ventilation system effluent particulate monitor channel checks, source checks, channel test and channel calibration shall be performed at a frequency specified in the ODCM.
- d. The ventilation system HEPA Filter will be tested to verify efficiencies in accordance with the requirements of the ODCM.

3.5.4

Audits

The audit function is independent of the SNEC facility management. Audits shall be performed by qualified individuals, as a minimum, for those activities designated within the scope of the SNEC facility's Quality Assurance Program. Audits are generally conducted biennially, however, frequency is based on the level of activity at the SNEC facility. Audits may also be performed at the request of the GPU NUCLEAR Cognizant Officer. Audits are performed in accordance with approved Quality Assurance Plan procedures. The audit procedures identify areas which may be included in the audit scope. Audit reports shall be forwarded to the GPU NUCLEAR Cognizant Officer within 60 days of completion of the audit.

3.5.5

TMI-2/SNEC Oversight Committee

3.5.5.1

The TMI-2/SNEC Oversight Committee shall report to the GPU NUCLEAR Cognizant Officer. The Committee will consist of at least four members. Membership will be on the recommendation of the Committee Chairman and approval of the GPU NUCLEAR Cognizant Officer. Three members shall constitute a quorum.

3.5.5.2

It shall be responsible to provide independent overview and assessment of all matters with radiological safety implications relative to activities at the SNEC facility. The Committee will review proposed License and Technical Specification changes, DECOMMISSIONING ACTIVITIES, special nuclear and radioactive material activities, facility changes, radiological conditions, audit reports and NRC Inspection reports and corrective actions for deficiencies identified.

- 3.5.5.3 Meetings shall be held at least three times per year.
- 3.5.5.4 Written minutes of all meetings shall be prepared and distributed to the GPU NUCLEAR Cognizant Officer within 30 days of the meeting date.
- 3.6 Procedures, Programs and Manuals
- 3.6.1 Procedures
- 3.6.1.1 Activities which are designated as within the scope of the SNEC facility's Quality Assurance Program shall be prescribed by written, reviewed and approved procedures of a type appropriate to the circumstances.
- 3.6.1.2 Written procedures shall be established, implemented and maintained for the activities listed below:
- 3.6.1.2.1 Characterization, decommissioning and maintenance activities determined to be within the scope of the QA program.
- 3.6.1.2.2 Access control, emergency actions (including fire protection program implementation), facility inspections and audits.
- 3.6.1.2.3 Radiological exposure control, survey activities and radwaste shipping and handling.
- 3.6.1.2.4 Activities which could result in a MEASURABLE RELEASE to the environment.
- 3.6.1.3 These procedures shall require that the following actions be taken:
- 3.6.1.3.1 All DECOMMISSIONING ACTIVITIES and maintenance work under Health Physics control shall be consistent with 10 CFR Part 20 requirements to minimize the radiation exposure of personnel and to prevent the release of radioactivity in excess of allowable limits to the environment.
- 3.6.1.3.2 All radiation surveys, tests, counting work, radiation exposure control measures and all other work performed in radiologically controlled areas shall conform with the requirements of the Radiation Protection Plan.

10 CFR, Part 20.1301; 40 CFR, Part 190; 10 CFR, Section 50.36; 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 approval of the Program Director, SNEC Facility.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual 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 areas of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

3.7 Fire Protection

- 3.7.1 Procedures will be established and implemented for fire prevention and responding to fires.
- 3.7.2 Portable fire extinguishing equipment shall be available to support DECOMMISSIONING ACTIVITIES in progress.
- 3.7.3 Personnel standing fire watch will be trained and requalified on an annual frequency.

3.8 Reporting

In addition to those reports required by applicable NRC regulations (i.e., violation of license or technical specification condition) GPU NUCLEAR shall submit the following:

- 3.8.1 A report of any occurrence of a possible unsafe condition relating to the facility or to the public. For each occurrence, SNEC shall promptly, within 24 hours of discovery, notify by telephone or facsimile the NRC Operations Center, and shall submit a written follow-up report to the Document Control Desk within 30 days, which describes the circumstances and the corrective action taken. These reports shall include:

- 3.8.1.1 Any unplanned or uncontrolled release of radioactive material beyond the SITE BOUNDARY.
- 3.8.2 An annual report shall be submitted to the Document Control Desk, within 6 months after the end of the calendar year, of the status of the deactivated facility including:
 - 3.8.2.1 Information relating to changes in those management and supervisory positions designated in section 3.1 as being responsible for decommissioning the facility;
 - 3.8.2.2 A summary of decommissioning, design, and maintenance changes made to the deactivated facility;
 - 3.8.2.3 Results of surveys and monitoring performed in accordance with Specifications 3.6.2.1 and 3.6.2.2;
 - 3.8.2.4 A review of the performance of access control and surveillance measures.

3.9 Records

In addition to the records required by applicable NRC regulations, including Subpart L of 10 CFR, Part 20, 20.2101 through 20.2110 inclusive, GPU NUCLEAR shall retain records of the following for the duration of the license:

- 3.9.1 Records of all reportable events submitted to the Commission;
- 3.9.2 Records of principal DECOMMISSIONING ACTIVITIES;
- 3.9.3 Records of training and qualification of members of the facility staff;
- 3.9.4 Records of entries into the CONTAINMENT VESSEL involving radiation work permits and the reason for entry;
- 3.9.5 Radioactivity releases or discharges into the air or water beyond the effective control of SNEC as measured at or prior to the point of such release or discharge;
- 3.9.6 Records of reviews performed for changes made to procedures or equipment pursuant to 10 CFR 50.59;

Attachment 3

**Certificate of Service
Technical Specification Change Request No. 60**

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
SAXTON NUCLEAR EXPERIMENTAL CORPORATION

LICENSE NO. DPR-4
DOCKET NO. 50-146

CERTIFICATE OF SERVICE

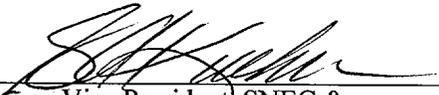
This is to certify that Technical Specification Change Request No. 60, to amend Appendix A to Operating License DPR-4 for the Saxton Nuclear Experimental Corporation Facility as revised, has been filed with executives of Liberty Township, Bedford County, Pennsylvania; Bedford County, Pennsylvania; and the Pennsylvania Department of Environmental Protection, by deposit in the United States mail addressed as follows;

Mr. Donald Weaver, Chairman
Liberty Township Supervisors
R.D. #1
R.D. #1, Geyers Church Road
Saxton, PA 16678

Mr. David J. Thompson, Chairman
Bedford County Commissioners
County Courthouse
Dauphin County Courthouse
203 South Juliana Street
Bedford, PA 15522

Director, Bureau of Radiation Protection
PA Department of Environmental Protection
Rachel Carson State Office Bldg., 13th Floor
P.O. Box 8469
Harrisburg, PA 17105-8469
Attn: Kenneth Singh

SAXTON NUCLEAR EXPERIMENTAL CORPORATION

BY: 

Vice President, SNEC &
Program Director, SNEC Facility

DATE: 