



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

SUPPORTING AMENDMENT NO. 35 TO FACILITY OPERATING LICENSE NO. DPR-50

METROPOLITAN EDISON COMPANY, JERSEY CENTRAL POWER & LIGHT COMPANY  
AND PENNSYLVANIA ELECTRIC COMPANY

THREE MILE ISLAND NUCLEAR STATION UNIT NO. 1

DOCKET NO. 50-289

Introduction

On November 29, 1976, the Commission published in the Federal Register an amended Section 20.103 of 10 CFR 20, which became effective on December 29, 1976. One effect of this revision was that in order to receive credit for limiting the inhalation of airborne radioactive material, respiratory protective equipment must be used as stipulated in Regulatory Guide 8.15. Another requirement of the amended regulation was that licensees authorized to make allowance for use of respiratory protective equipment prior to December 29, 1976, must bring the use of their respiratory protective equipment into conformance with Regulatory Guide 8.15 by December 29, 1977.

Metropolitan Edison Company (Met Ed), is presently authorized by the Technical Specifications for Three Mile Island Nuclear Station, Unit No. 1 (TMI-1) to make allowance for use of respiratory protective equipment at that facility. The present program, however, differs from that stipulated in Regulatory Guide 8.15. Accordingly, by letter dated July 28, 1977, we advised Met Ed that they should request amendment of the TMI-1 Technical Specifications. We further advised that because Section 6.11 of the TMI-1 Technical Specifications requires conformance with 10 CFR 20, and because 10 CFR 20.103 no longer requires specific authorization to employ respiratory protective equipment, that the necessary amendment to the TMI-1 Technical Specifications could be effected by deleting the present section dealing with respiratory protection (Section 6.12).

By letter dated November 15, 1977, Met Ed requested amendment of the TMI-1 Technical Specification provisions dealing with respiratory protection. The proposed revision would replace the present Section 6.12 with a statement committing Met Ed to conformance with Regulatory Guide 8.15, October 1976.

#### Evaluation

The proposed revision is administrative and does not have a direct effect on the safety of plant operation. The proposed revision is basically acceptable because it merely deletes provisions dealing with respiratory protection that have been made obsolete and unnecessary as a result of revision of the Commission's regulations. One aspect of the licensee's proposed revision, however, is not acceptable. This unacceptable feature is the reference to a specific edition of Regulatory Guide 8.15, specifically the October 1976 edition. This is not acceptable because 10 CFR 20.103 does not specify an edition of Regulatory Guide 8.15, but by inference refers to the most recent edition. Thus, by approving Met Ed's request as submitted, we could be approving nonconformance with the regulations if another edition of Regulatory Guide 8.15 were to be issued in the future.

This matter has been discussed with Met Ed and they have agreed to deletion of the reference to a specific edition of Regulatory Guide 8.15. They have further agreed that the present commitment to the requirements of 10 CFR 20 as stated in Specification 6.11 is all that is necessary to define an acceptable program for respiratory protection. We have, therefore, modified Met Ed's submittal accordingly and with these changes find the submittal acceptable.

#### Environmental Consideration

We have determined that this amendment does not authorize a change in effluent types or total amounts nor an increase in power level and will not result in any significant environmental impact. Having made this determination, we have further concluded that the amendment involves an action which is insignificant from the standpoint of environmental impact, and pursuant to 10 CFR §51.5(d)(4) that an environmental impact statement, or negative declaration and environmental impact appraisal need not be prepared in connection with the issuance of this amendment.

Conclusion

We have concluded, based on the considerations discussed above, that: (1) because the amendment does not involve a significant increase in the probability or consequences of accidents previously considered and does not involve a significant decrease in a safety margin, the amendment does not involve a significant hazards consideration, (2) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (3) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: December 29, 1977