

May 13, 1988

Docket No. 50-289

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Mr. Henry D. Hukill, Vice President  
and Director - TMI-1  
GPU Nuclear Corporation  
P. O. Box 480  
Middletown, Pennsylvania 17057

Dear Mr. Hukill:

SUBJECT: ISSUANCE OF AMENDMENT (TAC NO. 67564)

The Commission has issued the enclosed Amendment No. 139 to Facility Operating License No. DPR-50 for the Three Mile Island Nuclear Station, Unit No. 1, in response to your letter dated March 17, 1988, as supplemented March 28 and April 22, 1988.

The amendment replaces the organizational charts in the Technical Specifications with more general organizational requirements. These general requirements capture the essence of those organizational features depicted on the charts necessary for ensuring that the plant be operated safely.

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

original signed by

Ronald W. Hernan, Senior Project Manager  
Project Directorate I-4  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Enclosures:

- 1. Amendment No. 139 to DPR-50
- 2. Safety Evaluation

cc w/enclosures:  
See next page

LA:PDI-4  
SNorris  
04/28/88

PM:PDI-4  
RHernan:bd  
04/03/88

D:PDI-4  
JStolz  
05/04/88

OGC  
BmBordenick  
05/12/88

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

METROPOLITAN EDISON COMPANY

JERSEY CENTRAL POWER & LIGHT COMPANY

PENNSYLVANIA ELECTRIC COMPANY

GPU NUCLEAR CORPORATION

DOCKET NO. 50-289

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.139  
License No. DPR-50

1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by GPU Nuclear Corporation, et al. (the licensee) dated March 17, 1988, as supplemented March 28 and April 22, 1988 complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
  - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
  - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
  - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
  - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

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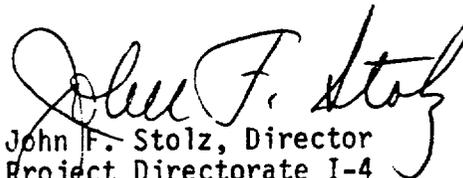
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.c.(2) of Facility Operating License No. DPR-50 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 139, are hereby incorporated in the license. GPU Nuclear Corporation shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



John F. Stolz, Director  
Project Directorate I-4  
Division of Reactor Projects I/II  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: May 13, 1988

ATTACHMENT TO LICENSE AMENDMENT NO. 139

FACILITY OPERATING LICENSE NO. DPR-50

DOCKET NO. 50-289

Replace the following pages of the Appendix A Technical Specifications with the attached pages. The revised pages are identified by amendment number and contain vertical lines indicating the area of change.

<u>Remove</u>	<u>Insert</u>
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viii	viii
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3-95b	--
3-95c	--
6-1	6-1,6-1a
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3.20

(DELETED)

## 6. ADMINISTRATIVE CONTROLS

### 6.1 RESPONSIBILITY

- 6.1.1 The Vice President - TMI-1 shall be responsible for unit operations and may, at any time, delegate his responsibilities in writing to the Operations and Maintenance Director, TMI-1. He shall delegate the succession of his responsibilities in writing during his absence.
- 6.1.2 The Shift Supervisor (or during his absence from the Control Room, a designated individual), shall be responsible for the Control Room command function. A management directive to this effect signed by the President - GPUNC shall be reissued to all unit personnel on an annual basis.

### 6.2 ORGANIZATION

#### 6.2.1 CORPORATE

6.2.1.1 An onsite and offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

6.2.1.2 Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. These relationships shall be documented and updated as appropriate, in the form of organizational charts. These organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

6.2.1.3 The President-GPUNC shall have corporate responsibility for overall plant nuclear safety and shall take measures to ensure acceptable performance of the staff in operating, maintaining, and providing technical support so that continued nuclear safety is assured.

#### 6.2.2 UNIT STAFF

6.2.2.1 The Vice President-TMI-1 shall be responsible for overall unit safe operation and shall have control over those on site activities necessary for safe operation and maintenance of the plant.

6.2.2.2 The unit staff organization shall meet the following:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be present in the control room when fuel is in the reactor.

- c. At least two licensed Reactor Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.
- d. The Shift Supervisor or Shift Foreman# shall be in the control room at all times other than cold shutdown conditions (T average < 200°F) when he shall be onsite.
- e. An individual## qualified pursuant to 6.3.2 in radiation protection procedures shall be on site when fuel is in the reactor.
- f. A licensed Senior Reactor Operator with no other concurrent operational duties shall directly supervise: (a) irradiated fuel handling and transfer activities on site, and (b) all unirradiated fuel handling and transfer activities to and from the Reactor Vessel.
- g. A Site Fire Brigade## of at least 5 members shall be maintained onsite at all times. The Site Fire Brigade shall not include members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- h. The Shift Technical Advisor shall serve in an advisory capacity to the Shift Supervisor on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.2.2.3 Individuals who train the operating staff and those who carry out the health physics and quality assurance function shall have sufficient organizational freedom to be independent from operating pressures, however they may report to the appropriate manager on site.

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# If not SRO license, he shall have completed the SRO Training program.

## The individual of item 6.2.2.2e and the Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

### 6.3 UNIT STAFF QUALIFICATIONS

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall meet the supplemental requirements specified in Sections A and C of Enclosure 1 of the March 28, 1980 NRC letter to all licensees. Individuals who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are not considered technicians or maintenance personnel for purposes of determining qualifications but are permitted to perform work for which qualification has been demonstrated.
- 6.3.2 The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each radiological controls technician/supervisor shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2/4.3.2, or be formally qualified through an NRC approved TMI-1 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 functions prior to their performance of those tasks.
- 6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in unit design, response and analysis of transients and accidents.

### 6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the plant training manager and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977. Licensed operator training shall also meet the requirements of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1976.

### 6.5 REVIEW AND AUDIT

#### 6.5.1 TECHNICAL REVIEW AND CONTROL

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 6.5.1.1 through 6.5.1.5 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.

- 6.5.1.1 Each procedure required by Technical Specification 6.8 and other procedures including those for tests and experiments which are important to safety, and changes thereto which are important to safety, shall be prepared by a designated individual(s)/group knowledgeable in the area affected by the procedure. Each such procedure, and change thereto, shall be reviewed for adequacy by an individual(s)/group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change.
- 6.5.1.2 Proposed changes to the Appendix "A" Technical Specifications shall be reviewed by a knowledgeable individual(s)/group other than the individual(s) group who prepared the change.
- 6.5.1.3 Proposed modifications to unit structures, systems and components important to safety shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. Each such modification shall be reviewed by an individual/group other than the individual/group which designed the modification but may be from the same division as the individual who designed the modification.
- 6.5.1.4 Proposed tests and experiments that are important to safety shall be reviewed by a knowledgeable individual(s)/group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments.
- 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/group which performed the investigation.
- 6.5.1.6 All REPORTABLE EVENTS shall be reviewed by an individual/group other than the individual/group which prepared the report.
- 6.5.1.7 Special reviews, investigations or analyses and reports thereon as requested by the Vice President TMI-1 shall be performed by a knowledgeable individual(s)/group.
- 6.5.1.8 The Security Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.

- 6.5.1.9 The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.10 A knowledgeable individual(s)/group shall review every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports to the Vice President TMI-1 covering evaluations, recommendations and disposition of the corrective action to prevent recurrence.
- 6.5.1.11 Major changes to radwaste systems shall be reviewed by a knowledgeable individual(s)/group other than the individuals(s)/group which prepared them.
- 6.5.1.12 Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.4 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel. Individuals responsible for reviews considered under 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.

#### RECORDS

- 6.5.1.13 Written records of activities performed under Specifications 6.5.1.1 through 6.5.1.11 shall be maintained.

#### QUALIFICATIONS

- 6.5.1.14 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 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.

#### 6.5.2 INDEPENDENT SAFETY REVIEW FUNCTION

- 6.5.2.1 The Vice President of each division within GPU Nuclear Corporation shall be responsible for ensuring the periodic independent safety review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility, as assigned in the GPUN Review and Approval Matrix.
- 6.5.2.2 Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work.
- 6.5.2.3 GPU Nuclear Corporation shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

dures at least once per 24 months.

- i. The Process Control Program and implementing procedures for solidification of radioactive wastes at least once per 24 months.
- j. The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977 at least once per 12 months.
- k. Any other area of unit operation considered appropriate by the IOSRG or the Office of the President - GPUNC.

6.5.3.2 Audits of the following shall be performed under the cognizance of the vice president responsible for technical support:

- a. An independent fire protection and loss prevention program inspection and audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- b. 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.

#### RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the Operation Quality Assurance Plan.

#### 6.5.4 INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG)

##### STRUCTURE

6.5.4.1 The IOSRG shall be a full-time group of engineers, experienced in nuclear power plant engineering, operations and/or technology, independent of the unit staff, and located on site.

##### ORGANIZATION

- 6.5.4.2 a. The IOSRG shall consist of a manager and a minimum staff of 3 members who meet the qualifications of 6.5.4.5. Group expertise shall be multi-disciplined.
- b. In the event of an unanticipated vacancy in the IOSRG staff, the number of staff can be two (2) members for a period of not to exceed six (6) months while the vacancy is being filled.
- c. The IOSRG shall report to the director responsible for nuclear safety assessment.

## FUNCTION

- 6.5.4.3 The periodic review functions of the IOSRG shall include the following on a selective and overview basis:
- 1) Evaluation for technical adequacy and clarity of procedures important to the safe operation of the unit.
  - 2) Evaluation of unit operations from a safety perspective.
  - 3) Assessment of unit nuclear safety programs.
  - 4) Assessment of the unit performance regarding conformance to requirements related to safety.
  - 5) Any other matter involving safe operations of the nuclear power plant that the onsite IOSRG manager deems appropriate for consideration.

## AUTHORITY

- 6.5.4.4 The IOSRG shall have access to the unit and unit records as necessary to perform its evaluations and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.

## QUALIFICATIONS

- 6.5.4.5 The IOSRG engineers shall have either: (1) a Bachelor's Degree in Engineering or the Physical Sciences and three years of professional level experience in the nuclear power field including technical supporting functions, or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.

## RECORDS

- 6.5.4.6 Reports of evaluations and assessments encompassed in Section 6.5.4.3 shall be prepared, approved, and transmitted to the director and the division vice president responsible for nuclear safety assessment, the Vice President-TMI-1, and the management positions responsible for the areas reviewed.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 139 TO FACILITY OPERATING LICENSE NO. DPR-50

METROPOLITAN EDISON COMPANY  
JERSEY CENTRAL POWER & LIGHT COMPANY  
PENNSYLVANIA ELECTRIC COMPANY  
GPU NUCLEAR CORPORATION

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-289

INTRODUCTION

By letter dated March 17, 1988, GPU Nuclear Corporation (licensee) proposed changes to Technical Specifications (TS) 6.2, Organization and 6.5.4, Independent Onsite Safety Review Group. In response to a staff request, supplemental information was provided in letters dated March 28 and April 22, 1988. This information did not alter the staff's initial determination of no significant hazards consideration.

The proposed changes would remove Figure 6-1, Organization Chart - GPU Nuclear Corporation and Figure 6-2, TMI-1 Unit Staff, and replace them with a narrative description of the offsite and onsite organizations functional requirements in TS 6.2.1 and unit staff qualifications in 6.2.2. Guidance for these proposed changes to TS was provided to licensees and applicants by Generic Letter 88-06, dated March 22, 1988. The changes proposed by the licensee would also remove cancelled section 3.20 from the TSs, remove references to Figures 6-1 and 6-2 in various other sections of the TS and would remove specific position titles from various sections in Chapter 6 of the TSs.

BACKGROUND

Consistent with the guidance provided in the Standard Technical Specifications, Specifications 6.2.1 and 6.2.2 of the administrative control requirements have referenced offsite and unit (onsite) organization charts that are provided as figures to these sections. On a plant specific basis, these organization charts have been provided by applicants and included in TS issued with the operating license. Subsequent restructuring of either the offsite or unit organizations, following the issuance of an operating license, has required licensees to submit a license amendment for NRC approval to reflect the desired changes in these organizations. As a consequence, organizational changes have necessitated the need to request an amendment of the operating license.

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Because of these limitations on organizational structure, the nuclear industry has highlighted this as an area for improvement in the TS. The Shearon Harris licensee proposed changes to remove organization charts from its TS under the lead-plant concept that included the endorsement of the proposed changes by the Westinghouse Owners Group. In its review of the Shearon Harris proposal, the staff concluded that most of the essential elements of offsite and onsite organization charts are captured by other regulatory requirements, notably, Appendix B to 10 CFR Part 50. However, there were aspects of the organizational structure that are important to ensure that the administrative control requirements of 10 CFR 50.36 would be met and that would not be retained with the removal of the organization charts. The applicable regulatory requirements are those administrative controls that are necessary to ensure safe operation of the facility. Therefore, those aspects of organization charts for Shearon Harris that were essential for conformance with regulatory requirements were added (1) to Specification 6.2.1 to define functional requirements for the offsite and onsite organizations and (2) to Specification 6.2.2 to define qualification requirements of the unit staff.

By letter dated January 27, 1988, the staff issued Amendment No. 3 to Facility Operating License NPF-63 for the Shearon Harris Nuclear Power Plant that incorporated these changes to their TS. Subsequently the staff developed guidance on an acceptable format for license amendment requests to remove the organization charts from TS. Generic Letter 88-06 provided this guidance to all power reactors.

#### EVALUATION

The licensee's proposed changes to its TS are in accordance with the guidance provided by Generic Letter 88-06 and addressed the items listed below.

- (1) Specifications 6.2.1 and 6.2.2 were revised to delete the references to Figures 6-1 and 6-2 that were removed from the TS.
- (2) Functional requirements of the offsite and onsite organizations were defined and added to Specification 6.2, and they are consistent with the guidance provided in Generic Letter 88-06. The specification notes that implementation of these requirements is documented in the TMI-1 FSAR.
- (3) The organization chart for the unit staff does not stipulate senior reactor operator or reactor operator license qualified positions. Hence, this is not an applicable consideration related to the removal of the organization charts from the TS for their plant.
- (4) Consistent with requirements to document the offsite and onsite organization relationships in the form of organization charts, the licensee has confirmed that this documentation currently exists in the FSAR.
- (5) The licensee has confirmed that no specifications, other than those noted in item (1) above, include references to the figures of the organization charts that are being removed from TS for their plant. Hence, this is not an applicable consideration, with regard to the need to redefine referenced requirements as a result of the removal of these figures.

- (6) The licensee proposed minor changes to Sections 6.3., 6.4 and 6.5 of the TSs which are consistent with the intent of not requiring TS changes prior to the restructuring of offsite or unit organizations. These changes consist of substituting more generic position titles for specific ones such as "the vice president responsible for technical support" instead of "The Vice President-Technical Functions." Although these changes are beyond the specific scope of Generic Letter No. 88-06, the staff has evaluated them and found them to have no safety significance and to be consistent with the purpose of the Generic Letter.

On the basis of its review of the above items, the staff concludes that the licensee has provided an acceptable response to those items as addressed in the NRC guidance on removing organization charts from the administrative control requirements of the TS. Accordingly, the staff finds the proposed changes to be acceptable.

The licensee also requested removal of TS Section 3.20 (Special Test Exceptions) in its March 17 request. This section provided for a low power natural circulation test for Cycle 5 restart. The Technical Specification states that it is cancelled following completion of the test. Removal of this section is administrative.

#### ENVIRONMENTAL CONSIDERATION

This amendment relates to changes in recordkeeping, reporting or administrative procedures or requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 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 this amendment.

#### CONCLUSION

On the basis of the considerations discussed above, the staff concludes that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, 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 to the health and safety of the public.

Dated: May 13, 1988

Principal Contributor:

Thomas G. Dunning, OTSB/DOEA  
Ronald W. Hernan, PDI-4/DPR-I/II