

December 21, 1993

Docket No. 50-289

Mr. T. Gary Broughton, Vice President
and Director - TMI-1
GPU Nuclear Corporation
Post Office Box 480
Middletown, Pennsylvania 17057

Distribution:

Docket File	CGrimes
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OGC	GHill(2)

Dear Mr. Broughton:

SUBJECT: ISSUANCE OF AMENDMENT IN RESPONSE TO TSCR NO. 229 (TAC NO. M88060)

The Commission has issued the enclosed Amendment No. 180 to Facility Operating License No. DPR-50 for the Three Mile Island Nuclear Station, Unit No. 1 (TMI-1), in response to your letter dated August 9, 1993.

The amendment changes the TMI-1 Technical Specifications to implement a major revision to 10 CFR Part 20, "Standards for Protection Against Radiation."

A copy of the related Safety Evaluation is also enclosed. Notice of Issuance will be included in the Commission's biweekly 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. 180 to DPR-50
2. Safety Evaluation

cc w/enclosures:
See next page

OFFICE	LA:PDI-4	PM:PDI-4	BC:PRPB	D:PDI-4	OGC
NAME	SNorris	RHernan:cn	LCunningham	JStolz	S.Horn
DATE	12/13/93	11/26/93	12/17/93	12/18/93	12/15/93

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

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Sincerely,

A handwritten signature in cursive script that reads "Ronald W. Hernan".

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. 180 to DPR-50
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. T. Gary Broughton
GPU Nuclear Corporation

Three Mile Island Nuclear Station,
Unit No. 1

cc:

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Board of County Commissioners
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Middletown, Pennsylvania 17057



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

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. 180
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 August 9, 1993, 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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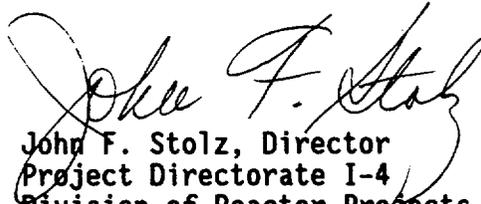
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.c.(2) of Facility Operating License No. DPR-50 is hereby amended to read as follows:

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. 180, 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, to be implemented on January 1, 1994.

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: December 21, 1993

ATTACHMENT TO LICENSE AMENDMENT NO. 180

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>
3-12	3-12
3-14	3-14
3-96	3-96
3-100	3-100
3-106	3-106
3-110	3-110
3-111	3-111
3-119	3-119
3-119a	3-119a
6-12a	6-12a
6-20	6-20
6-21	6-21
6-22	6-22

3.1.6 LEAKAGE

Applicability

Applies to reactor coolant leakage from the reactor coolant system and the makeup and purification system.

Objective

To assure that any reactor coolant leakage does not compromise the safe operation of the facility.

Specification

- 3.1.6.1 If the total reactor coolant leakage rate exceeds 10 gpm, the reactor shall be placed in hot shutdown within 24 hours of detection.
- 3.1.6.2 If unidentified reactor coolant leakage (excluding normal evaporative losses) exceeds one gpm or if any reactor coolant leakage is evaluated as unsafe, the reactor shall be placed in hot shutdown within 24 hours of detection.
- 3.1.6.3 If primary-to-secondary leakage through the steam generator tubes exceeds 1 gpm total for both steam generators, the reactor shall be placed in cold shutdown within 36 hours of detection.
- 3.1.6.4 If any reactor coolant leakage exists through a nonisolable fault in an RCS strength boundary (such as the reactor vessel, piping, valve body, etc., except the steam generator tubes), the reactor shall be shutdown, and cool-down to the cold shutdown condition shall be initiated within 24 hours of detection.
- 3.1.6.5 If reactor shutdown is required by Specification 3.1.6.1, 3.1.6.2, 3.1.6.3, or 3.1.6.4, the rate of shutdown and the conditions of shutdown shall be determined by the safety evaluation for each case.
- 3.1.6.6 Action to evaluate the safety implication of reactor coolant leakage shall be initiated within four hours of detection. The nature, as well as the magnitude, of the leak shall be considered in this evaluation. The safety evaluation shall assure that the exposure of offsite personnel to radiation is within the limits of Specification 3.22.2.1.
- 3.1.6.7 If reactor shutdown is required per Specification 3.1.6.1, 3.1.6.2, 3.1.6.3 or 3.1.6.4, the reactor shall not be restarted until the leak is repaired or until the problem is otherwise corrected.
- 3.1.6.8 When the reactor is critical and above 2 percent power, two reactor coolant leak detection systems of different operating principles shall be in operation for the Reactor Building with one of the two systems sensitive to radioactivity. The systems sensitive to radioactivity may be out-of-service for no more than 72 hours provided a sample is taken of the Reactor Building atmosphere every eight hours and analyzed for radioactivity and two other means are available to detect leakage.

Bases (Continued)

When reactor coolant leakage occurs to the intermediate cooling closed cooling water system, the leakage is indicated by both the intermediate cooling water monitor (RM-L9) and the intermediate cooling closed cooling water surge tank liquid level indicator, both of which alarm in the control room. Reactor coolant leakage to this receptor ultimately could result in radioactive gas leaking to the environment via the unit's auxiliary and fuel handling building vent by way of the atmospheric vent on the surge tank.

When reactor coolant leakage occurs to either of the decay heat closed cooling water systems, the leakage is indicated by the affected system's radiation monitor (RM-L2 or RM-L3 for system A and B, respectively) and surge tank liquid level indicator, all four of which alarm in the control room. Reactor coolant leakage to this receptor ultimately could result in radioactive gas leaking to the environment via the unit's auxiliary and fuel handling building vent by way of the atmospheric vent on the surge tank of the affected system.

Assuming the existence of the maximum allowable activity in the reactor coolant, a reactor coolant leakage rate of less than one gpm unidentified leakage within the reactor or auxiliary building or any of the closed cooling water systems indicated above, is a conservative limit on what is allowable before the limits of Specification 3.22.2.1 would be exceeded. This is shown as follows: if the specific activity of the reactor coolant is 130/E uCi/ml and the gaseous portion of it (as identified by UFSAR Table 11.1-2) is discharged to the environment via the unit's auxiliary and fuel handling building vent, the whole body dose rate resulting from this activity at the site boundary, using an annual average $X/Q = 4.5 \times 10^{-6}$ sec/m³, is 0.34 rem/year. This may be compared with the gaseous effluent dose rate specified in Specification 3.22.2.1 of 0.5 rem/year.

When the reactor coolant leaks to the secondary sides of either steam generator, all the gaseous components and a very small fraction of the ionic components are carried by the steam to the main condenser. The gaseous components exit the main condenser via the unit's vacuum pump which discharges to the condenser vent past the condenser off-gas monitor. The condenser off-gas monitor will detect any radiation, above background, within the condenser vent.

However, buildup of radioactive solids in the secondary side of a steam generator and the presence of radioactive ions in the condensate can be tolerated to only a small degree. Therefore, the appearance of activity in the condenser off-gas, or any other possible indications of primary to secondary leakage such as water inventories, condensate demineralizer activity, etc., shall be considered positive indication of primary to secondary leakage and steps shall be taken to determine the source and quantity of the leakage.

3.21 RADIOACTIVE EFFLUENT INSTRUMENTATION

3.21.1 RADIOACTIVE LIQUID EFFLUENT INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.21.1 The radioactive liquid effluent monitoring instrumentation channels shown in Table 3.21-1 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.22.1.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: At all times *

ACTION:

- a. With a radioactive liquid effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, immediately suspend the release of radioactive liquid effluent monitored by the affected channel or declare the channel inoperable.
- b. With less than the minimum number of radioactive liquid effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.21-1. Exert best efforts to return the instrumentation to OPERABLE status within 30 days and, if unsuccessful, explain in the next Annual Effluent Release Report why the inoperability was not corrected in a timely manner.

*For FT-84, and RM-L6, operability is not required when discharges are positively controlled through the closure of WDL-V257.

*For RM-L12 and associated IWTS/IWFS flow interlocks, operability is not required when discharges are positively controlled through the closure of IW-V72, 75 and IW-V280, 281.

*For FT-146, operability is not required when discharges are positively controlled through the closure of WDL-V257, IW-V72, 75 and IW-V280, 281.

BASES

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluent during actual or potential releases. The alarm/trip setpoints for these instruments shall be calculated in accordance with NRC approved methods in the ODCM to ensure that the alarm/trip will occur prior to exceeding ten times the effluent concentrations of 10 CFR Part 20.

3.21.2 RADIOACTIVE GASEOUS PROCESS AND EFFLUENT MONITORING INSTRUMENTATION

LIMITING CONDITION FOR OPERATION

3.21.2 The radioactive gaseous process and effluent monitoring instrumentation channels shown in Table 3.21-2 shall be OPERABLE with their alarm/trip setpoints set to ensure that the limits of Specification 3.22.2.1 are not exceeded. The alarm/trip setpoints of these channels shall be determined in accordance with the OFFSITE DOSE CALCULATION MANUAL (ODCM).

APPLICABILITY: As shown in Table 3.21-2.

ACTION:

- a. With a radioactive gaseous process or effluent monitoring instrumentation channel alarm/trip setpoint less conservative than required by the above specification, immediately suspend the release of radioactive effluent monitored by the affected channel or declare the channel inoperable.
- b. With less than the minimum number of radioactive gaseous process or effluent monitoring instrumentation channels OPERABLE, take the ACTION shown in Table 3.21-2. Exert best efforts to return the instrumentation to OPERABLE status within 30 days and, if unsuccessful, explain in the next Annual Effluent Release Report why the inoperability was not corrected in a timely manner.

BASES

The radioactive gaseous effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in gaseous effluent during actual or potential releases. The alarm/trip setpoints for these instruments shall be calculated in accordance with NRC approved methods in the ODCM to provide reasonable assurance that the annual releases are within the limits specified in 10 CFR 20.1301.

The low range condenser offgas noble gas activity monitors also provide data for determination of steam generator primary to secondary leakage rate. Channel operability requirements are based on an ASLB Order No. LBP-84-47 dated October 31, 1984, and as cited in 20 NRC 1405 (1984).

3.22 RADIOACTIVE EFFLUENT

3.22.1 LIQUID EFFLUENT

3.22.1.1 CONCENTRATION

LIMITING CONDITION FOR OPERATION

3.22.1.1 The concentration of radioactive material released at anytime from the unit to unrestricted areas (see Figure 5-3) shall be limited to ten times the concentrations specified in 10 CFR Part 20.1001-20.2401, Appendix B, Table 2, Column 2 for radionuclides other than dissolved or entrained noble gases. For dissolved or entrained noble gases, the concentration shall be limited to 3×10^{-3} uCi/cc total activity.

APPLICABILITY: At all times

ACTION:

With the concentration of radioactive material released from the unit to unrestricted areas exceeding the above limits, immediately restore concentration within the above limits.

BASES

This specification is provided to ensure that the concentration of radioactive materials released in liquid waste effluent from the unit to unrestricted areas will be less than ten times the concentration levels specified in 10 CFR Part 20.1001-20.2041, Appendix B, Table 2. This limitation provides additional assurance that the levels of radioactive materials in bodies of water outside the site will not result in exposures with (1) the Section II.A design objectives of Appendix I, 10 CFR Part 50, to a MEMBER OF THE PUBLIC and (2) the limits of 10 CFR Part 20.1301 to the population. The concentration limit for noble gases is based upon the assumption the Xe-135 is the controlling radioisotope and its MPC in air (submersion) was converted to an equivalent concentration in water using the methods described in International Commission on Radiological Protection (ICRP) Publication 2.

RADIOACTIVE EFFLUENTS

LIQUID HOLDUP TANKS

LIMITING CONDITION FOR OPERATIONS

3.22.1.4 The quantity of radioactive material contained in each of the following tanks shall be limited to less than or equal to 10 curies, excluding tritium and dissolved or entrained noble gases.

- a. Outside temporary tank

APPLICABILITY: At all times.

ACTION:

- a. With the quantity of radioactive material in any of the above listed tanks exceeding the above limit, immediately suspend all additions of radioactive material to the tank and within 48 hours reduce the tank contents to within the limit.

BASES

Restricting the quantity of radioactive material contained in the specified tanks provides assurance that in the event of an uncontrolled release of the tanks' contents, the resulting concentrations would be less than the limits of 10 CFR Part 20.1001-20.2401 Appendix B, Table 2, Column 2, at the nearest potable water supply and the nearest surface water supply in an unrestricted area. |

RADIOACTIVE EFFLUENT

3.22.2 GASEOUS EFFLUENT

3.22.2.1 DOSE RATE

LIMITING CONDITION FOR OPERATIONS

3.22.2.1 The dose rate due to radioactive materials released in gaseous effluent from the site (see Figure 5-3) shall be limited to the following:

- a. For noble gases: less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin, and
- b. For I-131, I-133, tritium and all radionuclides in particulate form with half lives greater than 8 days: less than or equal to 1500 mrem/yr to any organ.

APPLICABILITY: At all times.

ACTION:

With the release rate(s) exceeding the above limits, immediately decrease the release rate to comply with the above limit(s).

BASES

The specification provides reasonable assurance that the annual dose at the site boundary from gaseous effluent from all units on the site will be within the annual dose limits of 10 CFR Part 20 for unrestricted areas while providing sufficient operational flexibility in establishing effluent monitor setpoints. These gaseous release rates provide reasonable assurance that radioactive material discharged in gaseous effluent will not result in the exposure of a MEMBER OF THE PUBLIC in an unrestricted area, either within or outside the site boundary, to annual average concentrations exceeding the values specified in Appendix B, Table 2 of 10 CFR Part 20. For MEMBERS OF THE PUBLIC who may at times be within the site boundary, the occupancy of the MEMBER OF THE PUBLIC will be sufficiently low to compensate for any increase in the atmospheric diffusion factor above that for the exclusion area boundary. The specified release rate limits restrict, at all times, the corresponding gamma and beta dose rates above background to a MEMBER OF THE PUBLIC at or beyond the site boundary to less than or equal to 500 mrem/year to the total body or to less than or equal to 3000 mrem/year to the skin. These release rate limits also restrict, at all times, the corresponding thyroid dose rate above background to a child via the cow-milk pathway to less than or equal to 1500 mrem/year for the nearest cow to the plant.

RADIOACTIVE EFFLUENTS

3.22.4 TOTAL DOSE

LIMITING CONDITION FOR OPERATION

3.22.4 The annual (calendar year) dose or dose commitment to any member of the public, due to releases of radioactivity and to radiation from uranium fuel cycle sources shall be limited to less than or equal to 25 mrem to the total body or any organ except the thyroid, which shall be limited to less than or equal to 75 mrem.

APPLICABILITY: At all times.

ACTION:

With the calculated dose from the release of radioactive materials in liquid or gaseous effluents exceeding twice the limits of Specifications 3.22.1.2.a, 3.22.1.2.b, 3.22.2.2.a, 3.22.2.2.b, 3.22.2.3.a, or 3.22.2.3.b, calculations should be made including direct radiation contributions from the unit and from outside storage tanks to determine whether the above limits of Specification 3.22.4 have been exceeded. If such is the case, prepare and submit to the NRC Region I Administrator within 30 days, a Special Report which defines the corrective action to be taken to reduce subsequent releases to prevent recurrence of exceeding the above limits and includes the schedule for achieving conformance with the above limits. This Special Report, as defined in 10 CFR Part 20.2203(b), shall include an analysis which estimates the radiation exposure (dose) to a member of the public from uranium fuel cycle sources, including all effluent pathways and direct radiation, for the calendar year that includes the release(s) covered by this report. It shall also describe levels of radiation and concentrations of radioactive material involved, and the cause of the exposure levels or concentrations. If the estimated dose(s) exceed the above limits, and if the release condition resulting in violation of 40 CFR 190 has not already been corrected, the Special Report shall include a request for a variance in accordance with the provisions of 40 CFR 190. Submittal of the report is considered a timely request, and a variance is granted until staff action on the request is complete.

BASES

This specification is provided to meet the dose limitations of 40 CFR Part 190 that have been incorporated into 10 CFR Part 20.2203. This specification requires the preparation and submittal of a Special Report whenever the calculated doses from plant generated radioactive effluents and direct radiation exceed 25 mrem to the total body or any organ, except the thyroid, which shall be limited to less than or equal to 75 mrem. For sites

containing up to 4 reactors, it is highly unlikely that the resultant dose to a member of the public will exceed the dose limits of 40 CFR Part 190 if the individual reactors remain within twice the dose design objectives of Appendix I, and if direct radiation doses from the reactor units and outside storage tanks are kept small. The Special Report will describe a course of action that should result in the limitation of the annual dose to a member of the public to within the 40 CFR Part 190 limits. For the purposes of the Special Report, it may be assumed that the dose commitment to the member of the public from other uranium fuel cycle sources is negligible, with the exception that dose contributions from other nuclear fuel cycle facilities at the same site or within a radius of 8 km must be considered. If the dose to any member of the public is estimated to exceed the requirements of 40 CFR Part 190, the Special Report with a request for a variance (provided the release conditions resulting in violation of 40 CFR Part 190 have not already been corrected), in accordance with the provisions of 40 CFR Part 190.11 and 10 CFR Part 20.2203(b), is considered to be a timely request and fulfills the requirements of 40 CFR Part 190 until NRC staff action is completed. The variance only relates to the limits of 40 CFR Part 190, and does not apply in any way to the other requirements for dose limitation of 10 CFR Part 20, as addressed in Specifications 3.22.1.1 and 3.22.2.1. An individual is not considered a member of the public during any period in which he/she is engaged in carrying out any operation that is part of the nuclear fuel cycle.

3-119a

1. A tabulation on an annual basis of the number of station, utility, and other personnel (including contractors) for whom monitoring was required, receiving exposures greater than 100 mrem/yr and their associated man rem exposure according to work and job functions, (e.g., reactor operations and surveillance, inservice inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling). The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totaling less than 20% of the individual total dose need not be accounted for. In the aggregate, at least 80% of the total whole body dose received from external sources shall be assigned to specific major work functions. (This tabulation supplements the requirements of Section 20.2206 of 10 CFR Part 20.)

6-12a

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records of normal station operation including power levels and periods of operation at each power level.
- b. Records of principal maintenance activities, including inspection, repairs, substitution, or replacement of principal items of equipment related to nuclear safety.
- c. ALL REPORTABLE EVENTS.
- d. Records of periodic checks, tests and calibrations.
- e. Records of reactor physics tests and other special tests related to nuclear safety.
- f. Changes to procedures required by Specification 6.8.1.
- g. Deleted
- h. Test results, in units of microcuries, for leak tests performed on licensed sealed sources.
- i. Results of annual physical inventory verifying accountability of licensed sources on record.
- j. Control Room Log Book.
- k. Shift Foreman Log Book.

- 6.10.2 The following records shall be retained for the duration of Operating License DPR-50 unless otherwise specified in 6.10.1 above.
- a. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Final Safety Analysis Report.
 - b. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
 - c. Routine unit radiation surveys and monitoring records.
 - d. Records of doses received by all individuals for whom monitoring was required.
 - e. Records of radioactive liquid and gaseous wastes released to the environment, and records of environmental monitoring surveys.
 - f. Records of transient or operational cycles for those facility components which affect nuclear safety for a limited number of transients or cycles as defined in the Final Safety Analysis Report.
 - g. Records of training and qualification for current members of the unit staff.
 - h. Records of in-service inspections performed pursuant to these Technical Specifications.
 - i. Records of Quality Assurance activities required by the Operational Quality Assurance Plan.
 - j. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
 - k. Records of reviews by the Independent Onsite Safety Review Group.
 - l. Records of analyses required by the radiological environmental monitoring program.
 - m. Records of the service lives of all safety related hydraulic snubbers including the date at which the service life commences and associated installation and maintenance records.
 - n. Records of solid radioactive shipments.
 - o. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL and the PROCESS CONTROL PROGRAM.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

6.12.1 In lieu of the "control device" or "alarm signal" required by paragraph 20.1601 of 10 CFR 20:

- a. Each High Radiation Area in which the intensity of radiation at 30 cm (11.8 in.) is greater than 100 mrem/hr. deep dose but less than 1000 mrem/hr. shall be barricaded and conspicuously posted as a High Radiation Area, and personnel desiring entrance shall obtain a Radiation Work Permit (RWP). Any individual or group of individuals entering a High Radiation Area shall (a) use a continuously indicating dose rate monitoring device or (b) use a radiation dose rate integrating device which alarms at a pre-set dose level (entry into such areas with this monitoring device may be made after the dose rate level in the area has been established and personnel have been made knowledgeable of them), or (c) assure that a radiological control technician provides positive control over activities within the area and periodic radiation surveillance with a dose rate monitoring instrument.
- b. Any area accessible to personnel where an individual could receive in any one hour a deep dose in excess of 1000 mrem at 30 (11.8 in.) cm but less than 500 rads at one meter (3.28 ft.) from sources of radioactivity shall be locked or guarded to prevent unauthorized entry. The keys to these locked barricades shall be maintained under the administrative control of the respective Radiological Controls Supervisor.

The Radiation Work Permit is not required by Radiological Controls personnel during the performance of their assigned radiation protection duties provided they are following radiological control procedures for entry into High Radiation Areas.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 180 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

1.0 BACKGROUND

By letter dated August 9, 1993, GPU Nuclear Corporation (GPUN/licensee), submitted a request to the U.S. Nuclear Regulatory Commission (NRC) for changes to the Three Mile Island Nuclear Station, Unit No. 1 (TMI-1) Technical Specifications (TS). The amendment revises the plant TS to reflect a major revision to 10 CFR Part 20, "Standards for Protection Against Radiation." The revised Part 20 Rule was published in the Federal Register on May 21, 1991 (56 FR 23360) and is required to be implemented by January 1, 1994. The purpose of the rule change was to modify the NRC's radiation protection standards to reflect developments in the principles and scientific knowledge underlying radiation protection that have occurred since Part 20 was originally issued more than 30 years ago. The new rule also implements 1987 Presidential guidance on occupational radiation exposure. During a conference call between the NRC staff and the GPUN staff on December 7, 1993, certain minor word changes were agreed upon to the bases for TS Section 3.1.6 (TS page 3-14). These changes make the bases consistent with regard to radiation dose versus dose rate.

The radiation protection standards in the revised Part 20 Rule are based on the following assumptions:

- (1) Within the range of exposure conditions usually encountered in radiation work, there is a linear relationship, without threshold, between dose and the probability of stochastic (randomly occurring) health effects (such as latent cancer and genetic effects) occurring;
- (2) The severity of each type of stochastic health effect is independent of dose; and
- (3) Nonstochastic (nonrandom) radiation-induced health effects can be prevented by limiting exposures so that doses are below the thresholds for their induction.

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The rule change also revised several definitions and introduced some new ones relative to radiation exposure guidelines. It also introduced the new international system of units (SI) for dose and radioactivity, those being the gray, sievert, and becquerel. However, licensees are permitted to continue using the units rad, rem, and curie.

2.0 EVALUATION

The licensee has proposed revising the TS to include wording that is consistent with the revised 10 CFR Part 20, "Standards for Protection Against Radiation", and will retain the same overall level of effluent control required to meet the design objectives of Appendix I to 10 CFR Part 50.

The proposed TS changes and evaluations follow:

(1) Technical Specification 3.1.6.6 and bases for Section 3.1.6

The licensee has proposed substituting "Specification 3.22.2.1" for "10 CFR 20" as the reference for the action required to evaluate the safety significance of reactor coolant leakage. A similar change is proposed for the BASES for this section of the TS. The wording of the last two sentences in the third paragraph of TS page 3-14 are slightly different than those submitted by the licensee. These changes corrected a previously existing error in the discussion of dose versus dose rate and were agreed upon during a conference call with the licensee on December 7, 1993.

These changes are considered to be editorial and are acceptable.

(2) Technical Specification 3.21.1 Bases

The licensee has proposed revising the Bases to reflect a setpoint for the radioactive effluent monitoring instrumentation of ten times the effluent concentrations listed in 10 CFR Part 20. This is a change only to a BASES section and is acceptable.

(3) Technical Specification 3.21.2 Bases

The licensee has proposed to revise the words "... the limits of 10 CFR Part 20" to read "... the limits specified in 10 CFR 20.1301" to more specifically reflect the requirements of Paragraph 20.1301, which is entitled "Radiation Dose Limits for Individual Members of the Public." This TS section specifies requirements for establishing setpoints for radioactive gaseous process and effluent monitoring instrumentation.

This change is administrative in nature to incorporate the corresponding revised 10 CFR Part 20 paragraph and is acceptable.

(4) Technical Specification 3.22.1 (Liquid Effluent) and Bases

The licensee has proposed to change the words "... concentrations specified in 10 CFR Part 20, Appendix B, Table II, Column 2" to read "... ten times the concentrations specified in 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 2" in the TS and in the BASES. A reference to 10 CFR Part 20.106(e) in the BASES is also being changed to 10 CFR Part 20.1301 to conform with the corresponding new section.

The licensee has proposed this change in order to retain operational flexibility consistent with Appendix I to 10 CFR Part 50, concurrent with the implementation of the revised 10 CFR Part 20.

The current requirements for the content of the licensee's TS concerning radioactive effluents are contained in 10 CFR 50.36a. 10 CFR 50.36a requires licensees to maintain control over radioactive material in gaseous and liquid effluents to unrestricted areas, produced during normal reactor operations, to levels that are as low as is reasonably achievable (ALARA). For power reactors, Appendix I to 10 CFR Part 50 contains the numerical guidance to meet the ALARA requirement. The dose values specified in Appendix I of 10 CFR Part 50 are small percentages of the implicit limits in 10 CFR 20.106 and the explicit limits in 10 CFR 20.1301. As secondary controls, the instantaneous dose rates required by the proposed TS were chosen by the staff to help maintain annual average releases of radioactive material in gaseous and liquid effluents to within the dose values specified in Appendix I of 10 CFR Part 50. For the purposes of the proposed TS, 10 CFR Part 20 is used as a source of reference values only. These TS requirements allow operational flexibility, compatible with considerations of health and safety, which may temporarily result in release rates which, if continued for the calendar quarter, would result in radiation doses higher than specified in Appendix I of 10 CFR Part 50. However, these releases are within the implicit limits in 10 CFR 20.106 and the explicit limits in 10 CFR 20.1302, which reference Appendix B, Table II concentrations. These referenced concentrations in the old 10 CFR Part 20 are specific values which relate to an annual dose of 500 mrem. The liquid effluent radioactive effluent concentration limits given in 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 2, are based on an annual dose of 50 mrem total effective dose equivalent. Since an instantaneous release concentration corresponding to a dose rate of 500 mrem/year has been acceptable as a TS limit for liquid effluents, which applies at all times to assure that the values in Appendix I of 10 CFR Part 50 are not likely to be exceeded, it is not necessary to reduce this limit by a factor of ten.

The licensee states that operational history at TMI-1 has demonstrated that the use of the concentration values associated with 10 CFR 20.106 as TS limits has resulted in calculated maximum individual doses to a member of the public that are small percentages of the values given in Appendix I to 10 CFR Part 50. Therefore, the use of effluent concentration values

that are ten times those listed in Appendix B, Table 2, Column 2 to 10 CFR 20.1001-20.2401 will not have a negative impact on the ability to continue to operate within the design objectives in 10 CFR Part 50, Appendix I and 40 CFR Part 190.

Based on the above, it is acceptable that the instantaneous limits associated with the liquid release rate TS are based on ten times the effluent concentration values given in 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 2, to apply at all times.

(5) Technical Specification 3.22.1.4 Bases

The licensee has proposed to change the words "... limits of 10 CFR Part 20, Appendix B, Table II, Column 2" to read "... limits of 10 CFR 20.1001-20.2401, Appendix B, Table 2, Column 2..." in the BASES.

The change is administrative in nature to be consistent with the revised 10 CFR Part 20 and is acceptable.

(6) Technical Specification 3.22.2.1

The Limiting Condition for Operations for this TS reads as follows:

3.22.2.1 "The dose rate due to radioactive materials released in gaseous effluent from the site (See Figure 5-3) shall be limited to the following:

- a. For noble gases: less than or equal to 500 mrem/yr to the total body and less than or equal to 3000 mrem/yr to the skin, and
- b. For I-131, I-133, tritium and all radionuclides in particulate form with half-lives greater than 8 days: less than or equal to 1500 mrem/yr to any organ."

The licensee does not propose to change the TS but has proposed changing the discussion in the BASES to reflect that the TS provides reasonable assurance that the annual dose at the site boundary from gaseous effluent from all units on the site will be within the annual dose limits of 10 CFR Part 20 for unrestricted areas while providing sufficient operational flexibility in establishing effluent monitor setpoints. The licensee believes this change is necessary in order to retain operational flexibility consistent with 10 CFR Part 50, Appendix I, concurrent with the implementation of the revised 10 CFR Part 20.

The current requirements for the content of the licensee's TS concerning radioactive effluents are contained in 10 CFR 50.36a. 10 CFR 50.36a requires licensees to maintain control over radioactive material in gaseous and liquid effluents to unrestricted areas, produced during normal reactor operations, to levels that are ALARA. For power reactors, Appendix I to 10 CFR Part 50 contains the numerical guidance to meet the

ALARA requirement. The dose values specified in Appendix I of 10 CFR Part 50 are small percentages of the implicit limits in 10 CFR 20.106 and the explicit limits in 10 CFR 20.1301. As secondary controls, the instantaneous dose rates required by this specification were chosen by the staff to help maintain annual average releases of radioactive material in gaseous and liquid effluents to within the dose values specified in Appendix I of 10 CFR Part 50. For purpose of the bases of this TS, 10 CFR Part 20 is used as a source of reference values only. These TS requirements allow operational flexibility, compatible with considerations of health and safety, which may temporarily result in release rates which, if continued for the calendar quarter, would result in radiation doses higher than specified in Appendix I of 10 CFR Part 50. However, these releases are within the limits specified in 10 CFR 20.106 (10 CFR 20.1302).

This specification is acceptable as a TS limit for gaseous effluents, which applies at all times as an assurance that the values in Appendix I of 10 CFR Part 50 are not likely to be exceeded. The discussion in the BASES was changed slightly from that proposed by the licensee to compare actual expected dose rate for the maximum leak rate to 0.5 Rem per year.

(7) Technical Specification 3.22.4

The licensee has proposed to revise the reference in the Action Statement and the BASES from 10 CFR Part 20.405c to 10 CFR Part 20.2203(b), and the reference in the BASES from 10 CFR Part 20 by 46 FR 18525 to 10 CFR Part 20.2203.

The change is administrative in nature to incorporate the corresponding revised 10 CFR Part 20 section numbers and is acceptable.

(8) Technical Specification 3.22.4

The licensee has proposed to update the references in the TS and BASES for submitting a Special Report as defined in 10 CFR 20.2203.

The change is administrative in nature and is acceptable.

(9) Technical Specification 6.9.1.B.1

The licensee has proposed to update the reference regarding annual reports to 10 CFR 20.2206 and to add the words "for whom monitoring was required" to the reporting requirement.

These changes are administrative in nature to incorporate the corresponding revised 10 CFR Part 20 section number and requirements and are acceptable.

(10) Technical Specification 6.10. (RECORD RETENTION)

The licensee has proposed to change the record retention requirements for solid radioactive shipments from five years to the duration of the license consistent with the revision to 10 CFR Part 20 by moving the requirement from TS 6.10.1 to TS 6.10.2. Additionally, TS 6.10.2.d is being revised to clarify the requirement for retention of records of radiation doses for only those people for whom monitoring was required. Finally, TS 6.10.3 is being moved to TS 6.10.2 for consistency.

These changes are administrative in nature to incorporate the revised 10 CFR Part 20 requirements and are acceptable.

(9) Technical Specification 6.12

The licensee has proposed to revise the words that describe a high radiation area consistent with the revised 10 CFR Part 20 and to update the appropriate reference from 20.203(c)(2) to 20.1601 of 10 CFR Part 20. The change is administrative in nature to delete an obsolete position title and is acceptable.

These changes are administrative in nature to incorporate the revised 10 CFR Part 20 requirements and are 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 changes requirements with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes the surveillance requirements. The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts or types of effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (58 FR 59751). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (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: December 21, 1993