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December 13, 2006
5928-06-20529

10CFR50.90

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

THREE MILE ISLAND NUCLEAR STATION, UNIT 2 (TMI-2)
POSSESSION ONLY LICENSE NO. DPR 73
DOCKET NO. 50-320
TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 85

SUBJECT: REMOVAL OF OCCUPATIONAL RADIATION EXPOSURE REPORT

In accordance with 10 CFR 50.4(b)(1), enclosed is TMI Unit 2 TSCR No. 85. The proposed administrative change deletes Technical Specification (TS) 6.8.1.3, the annual occupational radiation exposure report.

Using the standards in 10 CFR 50.92, GPU Nuclear has concluded that this proposed change does not constitute a significant hazards consideration, as described in the enclosed analysis performed in accordance with 10 CFR 50.91(a)(1).

Pursuant to 10 CFR 50.91(b)(1), a copy of this TSCR is provided to the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection, as well as the chief executives of the township and county in which the facility is located.

Please contact Adam Miller of TMI-1 Regulatory Assurance at (717) 948-8128, if you have any questions.

I declare under penalty of perjury that the foregoing is true and correct. Executed on 13th day of December, 2006.

Very truly yours,

A handwritten signature in cursive script that reads "Gary R. Leidich".

Gary R. Leidich
President & Chief Nuclear Officer

GRL/awm

IE56

Enclosures: 1) Safety Evaluation and No Significant Hazards Consideration Analysis
2) TMI-2 Technical Specifications Revised Pages
3) Markup of TMI-2 Technical Specifications Revised Pages

cc: USNRC Region I Administrator
USNRC TMI-2 Senior Project Manager
USNRC TMI Senior Resident Inspector
Chairman, Board of Supervisors of Londonderry Township
Chairman, Board of County Commissioners of Dauphin County
Director, Bureau of Radiation Protection, PA Department of Environmental Protection
File No. 06049

Enclosure 1

TMI Unit 2 Technical Specification Change Request No. 85
Safety Evaluation and No Significant Hazards Consideration Analysis

1.0 **Technical Specification Change Request (TSCR) No. 85**

GPU Nuclear requests that the revision for Table of Contents page vii, and page 6-11 be inserted into the existing TMI-2 Technical Specifications (TS).

The revised pages (showing the change location with a vertical bar on the right side of the page) are provided in Enclosure 2. Enclosure 3 provides a markup of the current pages.

2.0. **Description of Proposed Change**

TS 6.8.1.3 requires that an annual occupational radiation exposure report (ORER) be submitted of the number of station, utility, and other personnel for whom radiation exposure monitoring was performed according to work and job function.

3.0 **Background**

TS 6.8.1.3 requires an annual occupational radiation exposure report be submitted tabulating 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 person-rem exposure according to work and job functions (e.g., surveillance, routine maintenance, special maintenance (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 reporting requirements of 10 CFR 20.2206.

The NRC staff has undertaken a Reducing Unnecessary Burden Initiative (RUBI). A workshop was held on May 21, 2001 at which the NRC performance goal to reduce unnecessary regulatory burden on stakeholders was discussed, which included a solicitation of suggestions from the industry of candidate reporting requirement reductions. In a letter (Reference 1) dated July 2, 2001, NEI provided NRC a consolidated industry list of potential burden reduction items. NRC subsequently documented its plans for the RUBI in SECY-02-0081, "Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees," dated May 13, 2002 (Reference 2) and the Commission provided further direction on burden reduction initiatives to the NRC staff in a staff requirements memorandum dated June 25, 2002 (Reference 3).

The TMI site includes Unit 2, which is shutdown and co-located with the operating unit (TMI-1). TMI-1 has made a regulatory commitment to provide information to the NRC annually to support the apportionment of the station doses to differentiate between the operating and shutdown units (Reference 4).

4.0 **Technical Analysis**

10 CFR 20 provides the personnel radiation exposure reporting requirements for nuclear power plants and other licensees. 10 CFR 20.2206(c) specifically requires that each licensee file a report of radiation exposures and radioactive material intake for monitored personnel no later than April 30 of each year, covering the previous year. NRC Form 5 or electronic media including the equivalent of NRC Form 5 is used for this purpose.

The information provided by the 10 CFR 20.2206 reporting requirement is used by the NRC to evaluate trends regarding effectiveness of overall NRC and licensee radiation protection programs, and for comparative analyses of radiation protection performance among nuclear facilities. The data is also used as one of the metrics in NRC's Reactor Oversight Program and for inspection planning purposes, and for various other NRC applications. The data reported under 10 CFR 20.2206 is compiled by NRC and presented in the series of NUREG—0713 reports, "Occupational Radiation Exposure at Commercial Nuclear Power Plants," which are published annually.

TS 6.8.1.3 requires an annual occupational radiation exposure report be submitted tabulating 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 person-rem exposure according to work and job functions (e.g., surveillance, routine maintenance, special maintenance (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. The ORER supplements the reporting requirements of 10 CFR 20.2206; however, it is not required by 10 CFR 20.2206.

ORER data was also previously presented in NUREG-0713, through Volume 19 (report for calendar year 1997). In Volume 20 of NUREG -0713 (report for calendar year 1998), NRC announced that the ORER dose data by work function and employee type would no longer be published in the NUREG. Based on this, it is appropriate that Licensees should not be required to continue to submit the ORER data to NRC. The proposed reduction in reporting requirements provides an administrative burden reduction and associated cost savings without creating and adverse impact on plant or radiation protection safety.

5.0 **Regulatory Analysis**

5.1 No Significant Hazard Consideration

GPU Nuclear has evaluated whether or not a significant hazards consideration is involved with the proposed amendment by focusing on the three standards set forth in 10 CFR 50.92, "Issuance of amendment," as discussed below:

1. Does the proposed change involve a significant increase in the probability or consequences of an accident previously evaluated?

Response: No.

The proposed change eliminates the Technical Specification reporting requirement for occupational radiation exposure information, which is in excess to that required to be

submitted by regulations. The proposed change involves no changes to plant systems or accident analyses. As such, the change is administrative in nature and does not affect initiators of analyzed events or assumed mitigation of accidents. Therefore, the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Does the proposed change create the possibility of a new or different kind of accident from any accident previously evaluated?

Response: No.

The proposed change does not involve a physical alteration of the plant, add any new equipment, or require any existing equipment to be operated in a manner different from the present design. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the proposed change involve a significant reduction in a margin of safety?

Response: No.

This change is an administrative change to reporting requirements of occupational radiation exposure data, and will not reduce a margin of safety because it has no effect on any safety analyses assumptions. Hence, this change is administrative in nature. For these reasons, the proposed change does not involve a significant reduction in the margin of safety.

Based on the above, GPU Nuclear concludes that the proposed amendment presents no significant hazards consideration under the standards set forth in 10CFR50.92(c), and, accordingly, a finding of "no significant hazards consideration" is justified.

5.2 Applicable Regulatory Requirements/Criteria

10 CFR 20 provides the base radiation personnel exposure reporting requirements for nuclear power plants. 10 CFR 20.2206(c) requires that each licensee file a report of radiation exposures and radioactive material intake for monitored personnel for the previous year. There are no 10 CFR regulations that require the submittal of the ORER data, which rather is specified by individual plant Technical Specifications. The ORER data is of a general informational nature, and is not required by statute or used to support licensing applications. Accordingly, this proposed change does not alter or change any existing reporting obligations required by the Code of Federal Regulations and maintains consistency with required applicable regulatory requirements.

In conclusion, based on the considerations discussed above, (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.

6.0 **Environmental Consideration**

The proposed amendment is confined to (i) changes to surety, insurance, and/or indemnity requirements, or (ii) changes to recordkeeping, reporting, or administrative procedures or requirements. Accordingly, the proposed amendment meets the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(10).

Therefore, pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed amendment.

7.0 **References**

- 1) Letter dated July 2, 2001, from NEI to NRC, Workshop on Reducing Unnecessary Regulatory Burden
- 2) SECY-02-0081, May 13, 2002, NRC Letter from W. D. Travers to NRC Commissioners – Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees
- 3) SECY-02-0081, June 25, 2002, NRC Letter from A. L. Vietti-Cook to W. D. Travers – Staff Activities Related to the NRC Goal of Reducing Unnecessary Regulatory Burden on Power Reactor Licensees
- 4) Letter from K. R. Jury (Exelon/AmerGen), to U.S. NRC, "Supplement to Request for Amendment to Technical Specifications to Eliminate Requirements to Provide Monthly Operating Reports and Annual Occupational Radiation Reports," dated January 4, 2005

Enclosure 2

TMI-2 Technical Specifications Revised Pages

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ADMINISTRATIVE CONTROLS

6.8 REPORTING REQUIREMENTS (cont'd)

BIENNIAL REPORTS

6.8.1.4 Reports required on a biennial basis shall be submitted on a frequency not to exceed once every two years (24 months). The reports shall cover the activities of the unit as described below up to a minimum of 6 months prior to the date of the filing.

Reports required on a biennial basis shall include:

- a. All changes made to the PDMS SAR during the previous update.
- b. All changes, tests, or experiments meeting the requirements of 10 CFR 50.59.

SPECIAL REPORTS

6.8.2 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

NONROUTINE REPORTS

6.8.3 A report shall be submitted in the event that an Exceptional Occurrence as specified in Section 6.13 occurs. The report shall be submitted under one of the report schedules described below:

Enclosure 3

Markup of TMI-2 Technical Specifications Revised Pages

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ADMINISTRATIVE CONTROLS

6.8 REPORTING REQUIREMENTS (cont'd)

ANNUAL REPORTS¹

~~6.8.1.3 Annual reports covering the activities of the unit as described below during the previous calendar year shall be submitted prior to March 1 of each year.~~

~~Reports required on an annual basis shall include:~~

- ~~a. A tabulation 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 person-rem exposure according to work and job functions², e.g., surveillance, routine maintenance, special maintenance (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.~~

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6.8.2 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

NON NONROUTINE REPORTS

6.8.3 A report shall be submitted in the event that an Exceptional Occurrence as specified in Section 6.13 occurs. The report shall be submitted under on of the report schedules described below.

¹ ~~A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.~~

² ~~This tabulation supplements the requirements of Article 20.2206 of 10 CFR 20.~~