



GPU Nuclear, Inc.
Three Mile Island
Nuclear Station
Route 441 South
Post Office Box 480
Middletown, PA 17057-0480
Tel 717-948-8461

10 CFR 50.90

September 15, 2008
5928-08-20180

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Possession Only License No. DPR 73
NRC Docket No. 50-320

Subject: Supplement: Technical Specification Change Request for TMI Unit 2
Technical Specification Change Request (TSCR) No. 86
Deletion of Technical Specification Sections 6.5, Review and Audit

Reference: Letter from Joseph J. Hagan to U.S NRC, "Technical Specification Change
Request No. 86, Deletion of Technical Specification Sections 6.5, Review and
Audit," dated June 11, 2008

In Reference 1, GPU Nuclear requested NRC approval for the deletion of Three Mile Island Unit 2 (TMI-2) Technical Specification (TS) 6.5, Review and Audit requirements.

Subsequently, through an internal audit, five additional changes were identified that should have been included in the referenced submittal. Three references to the proposed deleted TS 6.5 sections had not been identified during the review process. Specifically, TS 6.7.2 references the proposed deleted TS 6.5.1, TS 6.7.3.b references the proposed deleted TS 6.5.1.9, and TS 6.7.3.c references the proposed deleted TS 6.5.1. Another change involves the deletion of TS 6.6.1.b, which is redundant to TS 6.5.2.5.d. Finally, TS 6.6.1.a needs an editorial change to reflect the deletion of TS 6.6.1.b. The attached TS markups are requested to be included in the review and approval of the referenced TSCR.

The technical analysis section of the referenced TSCR bound the technical justification for these changes.

Attachment 1 provides the proposed TMI-2 Technical Specification Revised Pages, and Attachment 2 provides the proposed TMI-2 Technical Specification Marked Pages for these additional administrative changes.

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GPU Nuclear has concluded that the supplemental proposed changes do not require a change to the original significant hazards consideration of the referenced TSCR. Pursuant to 10 CFR 50.91(b)(1), a copy of this supplemental TSCR is being provided to the designated officials of the Commonwealth of Pennsylvania, as well as the chief executives of the township and county in which the facility is located.

As requested in the referenced TSCR, GPU Nuclear requests that the review and approval of this request be coordinated with a similar request for TMI-1, so that the implementation of these TSCRs can be coordinated simultaneously at both TMI-1 and TMI-2.

No new regulatory commitments are established by this submittal.

If any additional information is needed, please contact Adam Miller at (717) 948-8128.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 15th day of September 2008.

Respectfully,



Joseph J. Hagan
President and Chief Nuclear Officer

Attachments: 1) Supplement to TMI-2 Technical Specification Change Request No. 86
Proposed Technical Specification Revised Pages
2) Supplement to TMI-2 Technical Specification Change Request No. 86 Proposed
Proposed Technical Specification Marked -Up Pages

cc: USNRC Region I Administrator
USNRC TMI-2 Senior Project Manager
USNRC TMI-2 Inspector
USNRC TMI-1 Senior Resident Inspector
Director, Bureau of Radiation Protection-PA Department of Environmental Resources
Chairman, Board of County Commissioners of Dauphin County
Chairman, Board of Supervisors of Londonderry Township
File No. 08020

Attachment 1

**Supplement to TMI Unit 2 Technical Specification Change Request No. 86
Proposed Technical Specification Revised Pages**

The pages included in this attachment are:

6-7

6-8

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Nuclear Regulatory Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 to 10 CFR 50.

6.7 PROCEDURES AND PROGRAMS

6.7.1 Written procedures shall be established, implemented, and maintained for the activities necessary to maintain the PDMS condition as described in the PDMS SAR. Examples of these activities are:

- a. Technical Specification implementation.
- b. Radioactive waste management and shipment.
- c. Radiation Protection Plan Implementation.
- d. Fire Protection Program implementation.
- e. Flood Protection Program implementation

ADMINISTRATIVE CONTROLS

6.7 PROCEDURES AND PROGRAMS (cont'd)

6.7.2 Each procedure required by Section 6.7.1, and SUBSTANTIVE CHANGES thereto, shall be reviewed and approved prior to implementation and shall be reviewed periodically as follows:

- a. At least every two years, the group responsible for Quality Assurance will assess a representative sample of plant procedures that are used more frequently than every two years.
- b. Plant procedures that have been used at least biennially receive scrutiny by individuals knowledgeable in procedures, and are updated as necessary to ensure adequacy during suitable controlled activities.
- c. Plant procedures that have not been used for two years will be reviewed before use or biennially to determine if changes are necessary or desirable.

6.7.3 Temporary changes to procedures in Section 6.7.1 above may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the responsible organization knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision; and
- c. The change is documented, reviewed and approved within 14 days of implementation.

6.7.4 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBERS OF THE PUBLIC from radioactive effluents as low as reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

Attachment 2

**Supplement to TMI Unit 2 Technical Specification Change Request No. 86
Proposed Technical Specification Marked-Up Pages**

The pages included in this attachment are:

6-7

6-8

ADMINISTRATIVE CONTROLS

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Nuclear Regulatory Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 to 10 CFR 50.5, and
- b. ~~Each REPORTABLE EVENT shall undergo an independent safety review pursuant to Specification 6.5.2.5.d.~~

6.7 PROCEDURES AND PROGRAMS

6.7.1 Written procedures shall be established, implemented, and maintained for the activities necessary to maintain the PDMS condition as described in the PDMS SAR. Examples of these activities are:

- a. Technical Specification implementation.
- b. Radioactive waste management and shipment.
- c. Radiation Protection Plan Implementation.
- d. Fire Protection Program implementation.
- e. Flood Protection Program implementation

ADMINISTRATIVE CONTROLS

6.7 PROCEDURES AND PROGRAMS (cont'd)

6.7.2 Each procedure required by Section 6.7.1, and SUBSTANTIVE CHANGES thereto, shall be reviewed and approved ~~as described in Section 6.5.1~~ prior to implementation and shall be reviewed periodically as follows:

- a. **At least every two years, the group responsible for Quality Assurance will assess a representative sample of plant procedures that are used more frequently than every two years.**
- b. **Plant procedures that have been used at least biennially receive scrutiny by individuals knowledgeable in procedures, and are updated as necessary to ensure adequacy during suitable controlled activities.**
- c. **Plant procedures that have not been used for two years will be reviewed before use or biennially to determine if changes are necessary or desirable.**

6.7.3 Temporary changes to procedures in Section 6.7.1 above may be made provided:

- a. The intent of the original procedure is not altered;
- b. The change is approved by two members of the responsible organization ~~qualified in accordance with Section 6.5.1.9~~ and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision; and
- c. The change is documented, reviewed and approved ~~as described in Section 6.5.1~~ within 14 days of implementation.

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