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E910-10-005

10 CFR 73.5

ATTN: Document Control Desk
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Three Mile Island Nuclear Power Station, Unit 2
Facility Operating License No. DPR-73
NRC Docket No. 50-320

SUBJECT: Request for Exemption from 10 CFR 73.55

REFERENCE: NRC Letter to FirstEnergy Corporation (James M. Lash), "Three Mile Island Nuclear Station Unit 2 - Revised Power Reactor Security Rule," dated August 2, 2010

In accordance with 10 CFR 73.5 "Specific exemptions," GPU Nuclear, Inc. (GPUN) is requesting a permanent exemption from specific security requirements of 10 CFR 73 "Physical Protection of Plants and Materials" for Three Mile Island Nuclear Station (TMI) Unit 2. The requested exemption would eliminate specific security requirements under 10 CFR 73.55 for TMI Unit 2 since the unit has been permanently shutdown and is maintained in a Post-Defueling Monitored Storage (PDMS) condition with no safety related systems remaining. All TMI Unit 2 accessible reactor fuel has been removed to the maximum extent possible following the March 1979 accident. Exelon Generation Company (Exelon) provides protection for TMI Unit 2 in conjunction with the TMI Site Security Plan.

Attachment 1 provides justification, as required in 10 CFR 73.5, that the exemption would not endanger life or property or the common defense and security, and is otherwise in the public interest.

The changes proposed in this exemption are not required to address an immediate safety or security concern, but rather are being submitted in response to the referenced NRC letter requesting FirstEnergy Corp. to evaluate the applicability of the current 10.CFR 73.55 to TMI Unit 2.

[1] Obtained from the Decommissioning Cost Analysis for Three Mile Island Unit 2 (Reference 5)

This exemption request contains no new regulatory commitments. Information supporting the exemption request is contained in Attachment 1 to this letter. GPUN requests approval of this exemption request by December 1, 2011.

If you have any questions or require additional information, please contact Mike Casey, GPU TMI-2 Responsible Engineer at 330-472-8589.

Sincerely,

James H. Lash
President and Chief Nuclear Officer
GPU Nuclear, Inc.

Attachments: 1. Request for Exemption related to 10 CFR 73, "Physical Protection of Plants and Materials"

cc: Regional Administrator - NRC Region I w/attachments
NRC Senior Resident Inspector – TMI "
NRC Project Manager, NRR – TMI "

bcc:

Sr. Vice President, Mid-Atlantic Operations	w/o attachments
Sr. Vice President, Operations Support	"
Vice President, Engineering	"
Site Vice President, TMI	"
Plant Manager, TMI	"
Director, Operations, TMI	"
Director, Security	"
Senior Manager, Site Security, TMI	"
Director, Site Training, TMI	"
Manager, Regulatory Assurance, TMI	"
Manager, Licensing – KSA 3-E	w/attachments
D. Walker – KSA 3-E	"
Commitment Coordinator - KSA 3-E	"
Records Management - KSA 1-N-1	
M. Ford, TMI-2 PDMS Manager	"
Karen Fili, GPU VP, Oversight, TMI-2	
Michael J. Casey, GPU Responsible Engineer, TMI-2	
David W. Jenkins, FE Legal	

ATTACHMENT 1

10 CFR 73.5 Exemption Request

Three Mile Island Nuclear Station, Unit 2
Docket No. 50-320

Request for Exemption

Related to 10 CFR 73,

"Physical Protection of Plants and Materials"

ATTACHMENT 1

REQUEST FOR EXEMPTION
RELATED TO 10 CFR 73,
"PHYSICAL PROTECTION OF PLANTS AND MATERIALS"

I. SPECIFIC EXEMPTION REQUEST

In accordance with 10 CFR 73.5 "Specific exemptions," GPU Nuclear, Inc. (GPUN) is requesting a permanent exemption from specific security requirements of 10 CFR 73 "Physical Protection of Plants and Materials" for Three Mile Island Nuclear Station (TMI) Unit 2. The requested exemption would eliminate specific security requirements under 10 CFR 73.55 for TMI Unit 2 since the unit is no longer licensed to operate and has been permanently shutdown since the March 1979 accident. The accessible reactor fuel has been removed and relocated to the Idaho National Engineering and Environmental Laboratory. TMI Unit 2 primary systems are located within the TMI Unit 1 Protected Area maintained by Exelon Generation Company, LLC (Exelon). The specific requirements of this exemption request are discussed in detail under Section II of this attachment.

Background[1]

TMI Unit 2 is located on the northern-most section of Three Mile Island near the east shore of the Susquehanna River in Dauphin County, Pennsylvania. The nuclear steam supply system (NSSS) consisted of a pressurized water reactor rated at a core thermal power level of 2772 MWth with a corresponding turbine-generator gross output of 959 MWe. The NSSS consisted of the reactor with two independent primary coolant loops, each containing two reactor coolant pumps and a steam generator. An electrically heated pressurizer and connecting piping completed the system.

The TMI Unit 2 operating license was issued on February 8, 1978, and commercial operation was declared on December 30, 1978. On March 28, 1979, the unit experienced an accident which resulted in severe damage to the reactor core initiated by interruption of secondary feedwater flow. TMI Unit 2 has been in a non-operating status since that time.

As a result of this accident, small quantities of core debris and fission products were transported through the Reactor Coolant System (RCS) and the reactor building as a result of the coolant flow through the pilot operated relief valve (PORV) and the makeup and purification system (MU&P) during the accident. In addition, a small quantity of core debris was transported to the auxiliary and fuel handling buildings (AFHB) via the MU&P. Further spread of the debris also occurred as part of the post-accident water processing cleanup activities.

GPU Nuclear conducted a substantial program to defuel the reactor vessel and decontaminate the facility. As a result, TMI Unit 2 has been placed in a safe, inherently stable condition suitable for long-term management. Fuel and core material removed in the defueling has been shipped off site. The current long-term management condition is termed Post-Defueling Monitored Storage (PDMS).

Substantial contaminated areas still exist under the PDMS, as well as trace quantities of spent nuclear fuel (SNF). The quantity of fuel remaining at TMI Unit 2 is a small fraction of the initial fuel load; approximately 99% was successfully removed in the defueling. Additionally, large quantities of radioactive fission products were released into various systems and structures. Most of this radioactivity was removed as part of the waste processing activities during the TMI

[1] Obtained from the Decommissioning Cost Analysis for Three Mile Island Unit 2 (Reference 5)

Unit 2 Clean-up Program which concluded with entry into PDMS in December 1993. Significant quantities of radioactive fission products were removed from the reactor coolant system in preparation for the PDMS. Most of the residual fuel remaining during PDMS is fixed in the form of fine and granular debris that is inaccessible to defueling, tightly adherent surface deposits not readily removable by available dynamic defueling techniques, and resolidified material that is either tightly adherent to the RV components or inaccessible to defueling. There is no physical inventory requirement for SNM quantities at TMI Unit 2 during PDMS because the remaining materials are of low enrichment, highly radioactive and relatively inaccessible. In 1985, the NRC granted TMI Unit 2 an exemption from the physical inventory requirements (reference 7).

The removed fuel is currently in storage at Idaho National and Environmental Engineering Laboratory, and the U.S. Department of Energy has taken title and possession of the fuel. There is no significant dismantlement underway. TMI Unit 1 was sold to AmerGen (now Exelon) in 1999. In 2000, GPU, Inc. and FirstEnergy Corp. entered into an Agreement and Plan of Merger. Under merger terms, FirstEnergy became the successor company to GPU, Inc.; however, GPU Nuclear retains the license for TMI Unit 2. Exelon is under contract to perform necessary maintenance and surveillance activities to maintain TMI Unit 2 in a safe, stable and secure condition in accordance with the PDMS Safety Analysis Report, Technical Specifications, Quality Assurance Plan and TMI-2 Possession-Only License. Decommissioning activities for TMI Unit 2 are planned to occur in parallel with the decommissioning of TMI Unit 1.

The total quantity of residual fuel is estimated to be less than 1100 kg distributed in three major plant locations as follows (Reference 5):

- Spent Fuel Auxiliary And Fuel Handling Buildings < 12 kg
- Reactor Building & Reactor Vessel (excluding the RCS) < 999 kg
- Reactor Coolant System (excluding the RV) < 89 kg

The residual fuel estimate was developed based on a variety of methods, including direct measurement by instrumentation, visual inspection, and sample collection and analysis.

II. BASIS FOR EXEMPTION REQUEST

Pursuant to 10 CFR 73.5, "Specific exemptions," the NRC may grant exemptions from the regulations in this part as it determines are authorized by law and will not endanger life or property or the common defense and security, and are otherwise in the public interest.

Part 73 of Title 10 of the *Code of Federal Regulations,* "Physical Protection of Plant and Materials," provides,

> *"This part prescribes requirements for the establishment and maintenance of a physical protection system which will have capabilities for the protection of special nuclear material at fixed sites and in transit and of plants in which special nuclear material is used."*

In Section 73.55, entitled "Requirements for physical protection of licensed activities in nuclear power reactors against radiological sabotage," paragraph (b)(1) states,

> *"The licensee shall establish and maintain a physical protection program, to include a security organization, which will have as its objective to provide high assurance that activities involving special nuclear material are not inimical to the common defense and security and do not constitute an unreasonable risk to the public health and safety."*

The NRC revised 10 CFR 73.55, in part to include the preceding language, through the issuance of a final rule on March 27, 2009. The revised regulation stated that it was applicable to all Part 50 licensees. In an August 2, 2010, letter to FirstEnergy Corp. (reference 1), the NRC stated that some Part 50 licensees (e.g., a Part 50 licensee with a facility undergoing decommissioning) may not have recognized the applicability of the revised Power Reactor Security Rule to their facility. As a result, Part 50 licensees with facilities in decommissioning or decommissioned status may be out of compliance with the current 10 CFR 73.55 security requirements. Accordingly, the NRC informed licensees with facilities in decommissioning status and other stakeholders that the requirements of 10 CFR 73.55 were applicable to all Part 50 licensees. In the August 2, 2010, letter, the NRC informed FirstEnergy Corp. of the applicability of the revised rule to TMI Unit 2 and that it would have to comply with the revised rule or request an exemption.

The security requirements of 10 CFR Part 73, as applicable to a 10 CFR Part 50 licensed facility, presume that the purpose of the facility is to possess and utilize Special Nuclear Material (SNM). However, the License for TMI Unit 2 had been revised to a Possession Only License which prohibits the operation of the reactor. Additionally, with the completion of the transfer of the accessible SNM from TMI Unit 2 to the Idaho National and Environmental Engineering Laboratory, there is no longer the ability for TMI Unit 2 to operate as a nuclear facility. As a result, the potential for radiological sabotage or diversion of SNM at TMI Unit 2 has been significantly reduced. The operating systems of TMI Unit 2 have been placed in a PDMS (a version of SAFESTOR) status and Unit 2 no longer has designated Vital Areas or Target Sets. The Unit 2 Main Control Room (MCR) is no longer continuously manned. Therefore, the continued application of the 10 CFR Part 73.55 requirements specific to TMI Unit 2 Target Sets, Vital Areas, Main Control Room, Safeguards Contingency Plans and Cyber Security are no longer necessary to achieve the underlying purpose of the rule.

Note, however, that by virtue of TMI Unit 2's location within the Unit 1 Protected Area, the SNM remaining in Unit 2 will remain protected in conjunction with the existing TMI Site Security Plan maintained by Exelon. This Security Plan fully complies with the requirements of 10 CFR 73.55 for Unit 1. GPUN is requesting exemption from only those requirements which no longer apply to TMI Unit 2 due to its current condition as a Post Defueling Monitored Storage (PDMS) plant.

Impacted Regulations

Cyber Security and Protection of Digital Assets

- 10 CFR 73.55 (a)(1): *By March 31, 2010, each nuclear power reactor licensee, licensed under 10 CFR part 50, shall implement the requirements of this section through its Commission-approved Physical Security Plan, Training and Qualification Plan, Safeguards Contingency Plan, and Cyber Security Plan referred to collectively hereafter as "security plans." Current applicants for an operating license under 10 CFR part 50, or combined license under 10 CFR part 52 who have submitted their applications to the Commission prior to the effective date of this rule must amend their applications to include security plans consistent with this section.*
- 10 CFR 73.55 (b)(8): *The licensee shall establish, maintain, and implement a cyber security program in accordance with § 73.54.*
- 10 CFR 73.55 (b)(9)(ii)(C): *The insider mitigation program must contain elements from the cyber security program described in § 73.54*

- 10 CFR 73.55 (c)(1)(i): *Licensee Security Plans must describe: How the licensee will implement requirements of this section through the establishment and maintenance of a security organization, the use of security equipment and technology, the training and qualification of security personnel, the implementation of predetermined response plans and strategies, and the protection of digital computer and communication systems and networks.*
- 10 CFR 73.55 (c)(6): *Cyber Security Plan. The licensee shall establish, maintain, and implement a Cyber Security Plan that describes how the criteria set forth in § 73.54, "Protection of Digital Computer and Communication Systems and Networks," of this part will be implemented.*
- 10 CFR 73.55 (m)(2): *Reviews of the security program must include, but not be limited to, an audit of the effectiveness of the physical security program, security plans, implementing procedures, cyber security programs, safety/security interface, activities, testing, maintenance, and calibration program, and response commitments by local, State, and Federal law enforcement authorities.*

  Requested Exemption and Justification

  GPUN is requesting exemption from the requirement to implement a Cyber Security Plan as discussed in 10 CFR 73.55. Cyber Security under 10 CFR 73.54 is applicable to licensees currently "licensed to operate a nuclear power plant under part 50." Since TMI Unit 2 is licensed to possess SNM, but not operate a nuclear power plant, requirements under 10 CFR 73.54 do not apply. Consequently, requirements under 10 CFR 73.55 that reference cyber security or protection of digital assets would not be applicable. Note that Exelon will implement a comprehensive Cyber Security Program for TMI Unit 1 under 10 CFR 73.54 to protect the site from Cyber threats; however, the scope of the plan will not include assessment of digital assets unique to TMI Unit 2.

Target Sets

Throughout 10 CFR 73.55, Target Sets are frequently referenced. Due to TMI Unit 2 current PDMS status with no safety-related systems, there are no longer designated Target Sets identified for TMI Unit 2. Regulations which refer to Target Sets are either not applicable to TMI Unit 2 or cannot be complied with verbatim due to the TMI plant condition. The following regulations under 73.55 discuss Target Sets in some capacity.

- 10 CFR 73.55(b)(4): *The licensee shall analyze and identify site-specific conditions, including target sets, that may affect the specific measures needed to implement the requirements of this section and shall account for these conditions in the design of the physical protection program.*
- 10 CFR 73.55 (f)(1): *The licensee shall document and maintain the process used to develop and identify target sets, to include the site-specific analyses and methodologies used to determine and group the target set equipment or elements.*
- 10 CFR 73.55 (f)(2): *The licensee shall consider cyber attacks in the development and identification of target sets*
- 10 CFR 73.55 (f)(3): *Target set equipment or elements that are not contained within a protected or vital area must be identified and documented consistent with the requirements in §73.55(f)(1) and be accounted for in the licensee's protective strategy*
- 10 CFR 73.55 (f)(4): *The licensee shall implement a process for the oversight of target set equipment and systems to ensure that changes to the configuration of the identified*

equipment and systems are considered in the licensee's protective strategy. Where appropriate, changes must be made to documented target sets

Requested Exemption and Justification

GPUN is requesting exemption from the listed regulations as they relate to Target Sets, based on the fact that TMI Unit 2 does not contain any defined Target Sets in its current PDMS status.

Physical Barriers

- 10 CFR 73.55 (e)(5): *Bullet Resisting Physical Barriers. The reactor control room, the central alarm station, and the location within which the last access control function for access to the protected area is performed, must be bullet-resisting.*

  Requested Exemption and Justification

  GPUN requests exemption from this requirement. The TMI Unit 2 Main Control Room is no longer a functional facility for controlling reactivity or safety related systems. Additionally, the facility is not continuously manned. The MCR is no longer classified as a Vital Area at TMI Unit 2. The requirement for Bullet Resisting Physical Barriers in the MCR is not necessary.

Vital Areas

- 10 CFR 73.55 (e)(9)(v): *At a minimum, the following shall be considered vital areas:*

  (e)(9)(v)(A) The reactor control room;

  (e)(9)(v)(B) The spent fuel pool;

  Requested Exemption and Justification

  GPUN is requesting exemption from the listed regulations. Due to its PDMS status, TMI Unit 2 has no defined Vital Areas containing Unit 2 equipment. The TMI Unit 2 Fuel Pool area is considered a Vital Area in that it provides access to the Unit 1 Fuel Pool. There are no operable safety systems supporting the Unit 2 Fuel Pool. The Fuel Pool has been drained and decontaminated and no longer serves as a spent fuel pool. Note that TMI does have a functional Central Alarm Station for the Protected Area that includes both the Unit 1 and 2 reactor buildings.

  By virtue of TMI Unit 2's location within the Unit 1 Protected Area, this section of the rule as it applies to the Central Alarm Station is being met as described in TMI Site Security Plan. TMI Unit 1 and Unit 2 share common a Central Alarm Station.

Waterways

- 10 CFR (e)(11)(A): *The licensee shall identify areas from which a waterborne vehicle must be restricted, and where possible, in coordination with local, state, and Federal agencies having jurisdiction over waterway approaches, deploy buoys, markers, or other equipment.*

  Requested Exemption and Justification

  An evaluation of areas from which waterborne vehicles must be restricted was completed but consideration was only given to TMI Unit 1 with regard to the need for such requirements. GPUN is requesting exemption from this regulation because Unit 2 does not contain Target Sets to protect through identification of these areas. Additionally, the Unit 2 River Water Intake Structure is no longer considered a Vital Area and is not within a

Protected Area. All equipment previously located within the intake structure has been removed and piping leading to the Protected Area has been filled in with concrete and stone. There are currently no buoys, markers or other equipment deployed in the waterways for Unit 2.

Communication

- 10 CFR 73.55 (j)(4): *The following continuous communication capabilities must terminate in both alarm stations required by this section*
  - 10 CFR 73.55 (j)(4)(ii): *A system for communication with the control room*
- 10 CFR 73.55 (n)(5): *Communication systems between the alarm stations and each control room, and between the alarm stations and local law enforcement agencies, to include backup communication equipment, must be tested for operability at least once each day*

Requested Exemption and Justification

GPUN requests an exemption from the requirement to maintain continuous communication capabilities with the TMI Unit 2 MCR. In its PDMS status, the TMI Unit 2 MCR is no longer continuously manned and is no longer a functional facility for controlling reactivity or safety related systems. There is no benefit in maintaining continuous communication capabilities with the TMI Unit 2 MCR.

By virtue of Unit 2's location within the TMI Unit 1 Protected Area, the section of the rule pertaining to testing communication capabilities with local law enforcement agencies is being met as described in TMI Site Security Plan.

Safeguards Contingency Plan

10 CFR 73.55(c) (5), *Safeguards Contingency Plan*

The licensee shall establish, maintain, and implement a Safeguards Contingency Plan that describes how the criteria set forth in appendix C, to this part, "Licensee Safeguards Contingency Plans," will be implemented.

Requested Exemption and Justification

GPUN requests an exemption of TMI Unit 2 from the requirements of 10 CFR 73.55(c)(5). TMI Unit 1 currently complies with Appendix C requirements. However, other than being located within Unit 1's Protected Area, the contingency plan does not consider Unit 2 assets since there are no Target Sets located within the facility.

As a matter of consequence, the strategy does provide an element of protection for TMI Unit 2. With Unit 2 being located within Unit 1's Protected Area, the defensive strategy does serve to challenge, prevent or otherwise interdict and neutralize any adversary that attempts to enter the Protected Area boundary surrounding the facility.

Related Precedent

On February 20, 2001, Sacramento Municipal Utility District (SMUD) submitted a similar request to the NRC in Letter MPC&D 01-012, "Proposed License Amendment No. 195 and Exemption from 10 CFR 50.54(p) and 10 CFR Part 73," for the Rancho Seco Nuclear Generating Station (Reference 5). On October 10, 2002, the NRC approved the SMUD exemption request.

On June 16, 2008, the NRC granted Humboldt Bay Power Plant Unit 3 a permanent exemption from the requirements in Section (p) under 10 CFR 50.54 "Conditions of Licenses" and 10 CFR 73 "Physical Protection of Plants and Materials," based on the fact that in 1985, Humboldt Bay

Unit 3 was placed in a SAFSTOR status and all fuel had been removed to an Independent Spent Fuel Storage Installation.

On October 8, 2010, the NRC granted Fermi Unit 1 a permanent exemption from the following security requirements: Section (p) under 10 CFR 50.54 "Conditions of Licenses" and 10 CFR 73 "Physical Protection of Plants and Materials." Fermi 1 was a fast breeder reactor power plant cooled by sodium and operated at essentially atmospheric pressure. In 1972, the decision was made to decommission Fermi 1. The fuel and blanket subassemblies were shipped offsite in 1973. The facility is permanently shut down and defueled and the licensee is no longer authorized to operate or place fuel in the reactor.

III. ENVIRONMENTAL ASSESSMENT

In accordance with 10 CFR 51.30 and 51.32, the following information is provided in support of an environmental assessment and finding of no significant impact for the proposed action. The proposed action would result in a permanent exemption from specific requirements of 10 CFR 73 "Physical Protection of Plants and Materials." for Three Mile Island Nuclear Station Unit 2.

The proposed exemption will not significantly increase the probability or consequences of accidents, no changes are being made in the types or quantities of any radiological effluents that may be released offsite, and there is no significant increase in occupational or public radiation exposure. Therefore, there are no significant radiological environmental impacts associated with the proposed exemption. In addition, the proposed exemption does not affect non-radiological plant effluents and has no other environmental impact. Therefore, there are no significant non-radiological impacts associated with the proposed exemption. As a result, in accordance with the requirements of 10 CFR 51.32, the proposed exemption will not have a significant effect on the quality of the human environment.

IV. CONCLUSION

GPUN considers that this Request for Exemption from the requirements of 10 CFR 73.55 as specified in this evaluation is in accordance with the criteria of 10 CFR 73.5. In accordance with 10 CFR 73.5(a)(1), the NRC is authorized to grant an exemption upon determining that the exemption is authorized by law, since the application of the regulation in this particular circumstance would not endanger life or property or the common defense and security, and are otherwise in the public interest .

The exemption to 10 CFR 73.55 is based on the transfer of the accessible SNM from the TMI Unit 2 site to the Idaho National Engineering and Environmental Laboratory. Special circumstances are present based on the completion of the transfer of the accessible SNM from TMI Unit 2 to the Idaho National Engineering and Environmental Laboratory. The operating systems of TMI Unit 2 have been placed in a PDMS (a version of SAFESTOR) status and Unit 2 no longer has designated Vital Areas or Target Sets. The Unit 2 MCR is no longer continuously manned. The continued application of the 10 CFR Part 73.55 requirements regarding TMI Unit 2 Target Sets, Vital Areas, Main Control Room, Safeguards Contingency Plans and Cyber Security are no longer necessary to achieve the underlying purpose of the rule. Finally, by virtue of its location within the TMI Unit 1 Protected Area, protections afforded by the Protected Area for Unit 1 as described in TMI Site Security Plan also apply to Unit 2. Therefore, GPUN hereby requests an exemption from the stated requirements of 10 CFR 73.55 for TMI Unit 2.

V. REFERENCES

1. NRC Letter to FirstEnergy Corporation (James M. Lash), "Three Mile Island Nuclear Station Unit 2 - Revised Power Reactor Security Rule," dated August 2, 2010.
2. NRC Letter to Sacramento Municipal Utility District (Mr. Steve J. Redeker), "Rancho Seco Nuclear Generating Station - Issuance of Amendment and Exemption from Requirements of 10 CFR Part 50 Security Requirements," dated October 10, 2002.
3. NRC Letter to Pacific Gas and Electric Company (Mr. John T. Conway), "Humboldt Bay Power Plant Unit 3 - Issuance of Amendment and Exemption From Requirements of 10 CFR Part 50 and 10 CFR Part 73 Security Requirements," dated June 16, 2008.
4. Letter from T. B. Smith (U.S. NRC) to J. H. Plona (DTE Energy), "Enrico Fermi Atomic Power Plant Unit 1 – Issuance of Exemption from Requirements of 10 CFR Part 50 and 10 CFR Part 73 Security Requirements," dated October 8, 2010.
5. Decommissioning Cost Analysis for Three Mile Island Unit 2, Document F07-1601-002, Rev. 0, prepared for FirstEnergy Corporation prepared by TLG Services, Inc. Bridgewater, Connecticut, January 2009.
6. TMI Nuclear Station Security Plan, Training and Qualification Plan, and Safeguards Contingency Plan, Rev. 11.
7. NRC Letter to GPU Nuclear Corporation (Mr. F.R. Standerfer), "Approval of Exemption from 10 CFR 30.51, 40.61, 70.51(d) and 70.53