### METROPOLITAN EDISON COMPANY JERSEY CENTRAL POWER & LIGHT COMPANY

AND

PENNSYLVANIA ELECTRIC COMPANY

THREE MILE ISLAND NUCLEAR STATION UNIT 1

Operating License No. DPR-50 Docket No. 50-289 Technical Specification Change Request No. 54

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix B to Operating License No. DPR-50 for Three Mile Island Nuclear Station Unit 1. As a part of this request, proposed replacement pages for Appendix B are also included.

METROPOLITAN EDISON COMPANY

Sworn and subscribed to me this 14 day of april

NOTARY PUBLIC Reading, Berks County, Pa

My Commission Expires Nov. 19, 1979

1564 290

THREE MILE ISLAND NUCLEAR STATION UNIT 1 (TMI-1) OPERATING LICENSE NO. DPR-50 DOCKET NO. 50-289 Technical Specification Change Request No. 54 The licensee requests that the attached changed page replace page 60 of the existing Technical Specifications, Appendix B. Change Request Section 5.1.D., page 60. (Responsibility) should be changed to read as follows: Reports are submitted and records are kept in accordance with 5.6 and 5.7 of the Environmental Technical Specifications. Violations of these Environmental Technical Specifications are investigated and appropriate corrective action taken to prevent recurrence. Responsibility for the independent review functions concerning environmental matters as defined in section 5.2 of these Environmental Technical Specifications has been assigned by the Manager - Generation to the Manager - Generation Engineering. When the review function is performed by the Radiation Safety and Environmental Engineering Section, the Manager - Generation shall ensure that necessary audits of those review functions are performed independently under the direction of the Manager - Operational Quality Assurance. When organizations other than Metropolitan Edison Company are utilized to establish and execute portions of these Environmental Technical Specifications, compliance with the Environmental Technical Specifications in such instances shall remain the responsibility of Metropolitan Edison Company. Section 5.2, page 60. (Organization) should be changed to read as follows: 5.2 Organization Organization of the personnel responsible for implementation, audit and review of these Environmental Technical Specifications including the Corporate level is as shown on Figure 8 of these Environmental Technical Specifications. In all matters pertaining to compliance with these Environmental Technical Specifications, the Unit Superintendent shall report to and be directly responsible to the Manager - Generation Operations -Nuclear. 1564 291

Section 5.3, page 60. (Audit and Review) should be changed to read as follows:

5.3 Audit and Review

Independent review functions for environmental matters will be performed under the direction and control of the Manager - Generation Engineering.

Independent review of environmental matters relating to these Environmental Technical Specifications will be conducted by the Radiation Safety and Environmental Engineering Section, reporting to the Manager - Generation Engineering. Their review will be audited by the Manager - Operational Quality Assurance. These audits and reviews will encompass:...

## Reason for Change Request

The responsibility for audit functions resides with the Quality Assurance Section as directed by Manager - Operational Quality Assurance (OQA). The scope of activities for the Operational Quality Assurance Department is established by the Vice President - Generation as promulgated in the Metropolitan Edison Company Operational Quality Assurance Plan and divisional procedures. Specifically Generation Procedure (GPF) 0002.006, Section III.c) states that a specific function of the Quality Assurance Department is "Reviewing Engineering design changes, procurement specifications, etc. for adequacy of OQA and Technical Specification requirements."

## Environmental Analysis Justifying Change Request

The proposed change, if implemented, would not degrade the present environmental monitoring program in that the change would not alter the present program, but only serve to eliminate any ambiguity that may exist concerning Environmental Technical Specification audit responsibility.

# Cost/Benefit Analysis Supporting Change Request

There is no cost associated with implementation of the proposed change other than administrative costs associated with processing it. The benefit that would be derived is the elimination of ambiguity as to audit responsibility for the Environmental Technical Specifications.

1564 292

D. Reports are submitted and records are kept in accordance with 5.6 and 5.7 of the Environmental Technical Specifications. Violations of these Environmental Technical Specifications are investigated and appropriate corrective action taken to prevent recurrence. Responsibility for the independent review functions concerning environmental matters as defined in section 5.2 of these Environmental Technical Specifications has been assigned by the Manager - Generation to the Manager - Generation Engineering. When the review function is performed by the Radiation Safety and Environmental Engineering Section, the Manager-Generation shall ensure that necessary audits of those review functions are performed independently under the direction of the Manager - Operational Quality Assurance.

When organizations other than Metropolitan Edison Company are utilized to establish and execute portions of these Environmental Technical Specifications, compliance with the Environmental Technical Specifications in such instances shall remain the responsibility of Metropolitan Edison Company.

### 5.2 Organization

Organization of the personnel responsible for implementation, audit and review of these Environmental Technical Specifications including the Corporate level is as shown on Figure 8 of these Environmental Technical Specifications. In all matters pertaining to compliance with these Environmental Technical Specifications, the Unit Superintendent shall report to and be directly responsible to the Manager - Generation Operations - Nuclear.

#### 5.3 Audit and Review

Independent review functions for environmental matters will be performed under the direction and control of the Manager - Generation Engineering. Independent review of environmental matters relating to these Environmental Technical Specifications will be conducted by the Radiation Safety and Environmental Engineering Section, reporting to the Manager - Generation Engineering. Their review will be audited by the Manager - Operational Quality Assurance. These audits and reviews will encompass:

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION IN THE MATTER OF DOCKET NO. 50-289 LICENSE NO. DPR-50 METROPOLITAN EDISON COMPANY This is to certify that a copy of Technical Specification Change Request No. 54 to Appendix B of the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with the U. S. Nuclear Regulatory Commission and been served on the chief executives of Londonderry Township, Dauphin County, Pennsylvania and Dauphin County, Pennsylvania by deposit in the United States mail, addressed as follows: Mr. Weldon B. Arehart Mr. Harry B. Reese, Jr. Board of Supervisors of Board of County Commissioners Londonderry Township of Dauphin County R. D. #1, Geyers Church Road Dauphin County Court House Middletown, Pennsylvania 17057 Harrisburg, Pennsylvania 17120 METROPOLITAN EDISON COMPANY Dated: April 14, 1977 1564 294