

Metropolitan Edison Company
Three Mile Island Nuclear Station Unit 1
Docket No. 50-289
Operating License No. DPR-50

Technical Specification Change Request 12

Licensee requests that the present text of Appendix B of the Technical Specifications, section 4.1.1A., "Method of Analysis" be changed to read as follows:

"Counting, determination of reproductive status, condition of organisms, and identification to the lowest feasible taxon. Total weight and fork length ranges of each taxon identified will be recorded. A continuing record will be maintained to allow comparison of variation of numbers with time."

Reason for Proposed Change 12

In light of recent compliance questions that have been raised regarding the intended meaning of the subject "Methods of Analysis," this change has been proposed to eliminate any ambiguity that may exist regarding what constitutes the section 4.1.1A. "Method of Analysis" requirements. Note: For additional information regarding the subject compliance questions, please refer to the Nuclear Regulatory Commission (NRC) Region 1 Office's letter regarding Inspection No. 50-289/74-34 (dated February 10, 1975; attached as Appendix (I)), and to the NRC Headquarter's Office of Inspection and Enforcement letter regarding this same inspection (dated April 24, 1975; attached as Appendix (II)).

Environmental Analysis Justifying Proposed Change 12

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 regarding the requirements of the subject "Methods of Analysis." Further, it should be noted that Licensee feels that the NRC's stated desire to require that impinged fish be weighed individually (ref: App. 1), if implemented, would not add anything to the presently existing program with regard to being able to predict the effects of impingement (ref: the "Bases" statements on page 42 of the Technical Specifications, Appendix B).

In addition, information regarding the insignificance of what would be derived from weighing fish individually is provided as follows:

- a. Impingement data collected at TMI-1 reflects a minimal impact on the environment in that the number and biomass of impinged fish has been very low compared to fish populations in the vicinity of TMI. To substantiate this statement, the following background information is provided:
 1. The results of 21 impingement surveys (February - December, 1974) show a total of 1222 fish of 25 species impinged. These fish weighed a total of 1930.1g (4.3 lbs) and most (~80%) were either young or juvenile,

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2. the greatest number and greatest total weight of fishes per 24 hour sampling period were respectively, 316 specimens and 668.3 g, and
 3. the mean number of fish impinged per 24 hour survey was 58, and the mean weight was 91.9 g (0.2 lbs)
- b. With regard to the specimens impinged at TMI:
1. Most are young and juvenile and weigh less than 1.0 g individually; therefore, little worth while data would be generated by taking individual weights,
 2. water weight is an appreciable part of the weight of small fish, and though our consultants blot the fish to remove excess surface moisture, additional handling, such as that that would be required by individual weighings, could increase the chance of weight variations, and
 3. data is presently collected so as to compile information on the numbers of fish, by taxon, falling within specified fork length ranges, and this data provides sufficient fish size information.

Cost/Benefit Analysis Supporting Proposed Change 12

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 that elimination of any ambiguity that may still exist regarding what constitutes the subject "Methods of Analysis" requirements would also serve to eliminate compliance questions that have been raised in this subject area. Further, it should be noted that if contrary to this request, a change were implemented whereby individual fish weights had to be taken, the cost of complying with such a requirement would

- a. increase about \$100 - \$500, due to having to procure a more accurate balance (accurate to ~0.01 g), and
- b. increase due to the increased man power required to weigh each fish individually.

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4.0 ENVIRONMENTAL SURVEILLANCE AND SPECIAL STUDIES

4.1 Biological4.1.1 AquaticObjective

To define operational surveillance programs to assess the impact of station operation on the aquatic flora and fauna in the near-site environs. The following parameters will be checked during the program: Impingement of Organisms, Entrainment of Plankton, Fish Eggs and Fish Larvae, Fish Populations, and Macro-invertebrates.

Specification

A continuing impingement and entrainment biological surveillance program (A, B, and C) shall be conducted. The results will be reviewed at the end of the first year and the program modified on approval of the staff. The program will be terminated at the end of the second year unless the review of the first year's data indicates the need for additional data.

	<u>Sample Frequency</u>	<u>Sample Location</u>	<u>Method of Sampling</u>	<u>Method of Analysis</u>
A. Impingement	Semi-monthly at 4-hour intervals over a 24-hour period	Traveling Screen	Removal from intake screens	Counting, determination of reproductive status and condition of organisms, and identification to the lowest feasible taxon. Total weight and fork length ranges of each taxon identified will be recorded. A continuing record will be maintained to allow comparison of variation of numbers with time.
B. Entrainment of Fish Eggs and Fish Larvae	Semi-monthly 4-hour intervals over a 24-hour period during April through October.	Intake and Discharge	Pumping	Counting and determination of extent of mortality, identification to the lowest feasible taxon. A continuing record will be maintained to allow comparison of variation of numbers with time.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

~~5-21-75~~ 5-21-75

IN THE MATTER OF

DOCKET NO. 50-289
OPERATING LICENSE NO. DPR-50

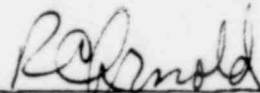
METROPOLITAN EDISON COMPANY

This is to certify that a copy of Technical Specification Change Request No. 12 to Appendix B of the Operating License for Three Mile Island Nuclear Station, Unit 1, dated May 21, 1975, and filed with the U.S. Nuclear Regulatory Commission May 21, 1975, has this 21st day of May, 1975, been served on the chief executives of Londonderry Township, Dauphin County, Pennsylvania, and of Dauphin County, Pennsylvania, by deposit in the United States Mail, addressed as follows:

Dr. Weldon B. Arehart, Chairman
Board of Supervisors of
Londonderry Township
R.D. #1, Geyers Church Road
Middletown, Pennsylvania 17057

Mr. Charles P. Hoy, Chairman
Board of County Commissioners of
Dauphin County
Dauphin County Courthouse
P.O. Box 1295
Harrisburg, Pennsylvania 17120

METROPOLITAN EDISON COMPANY

By 
Vice President-Generation

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APR 28 1975

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

APR 24 1975

Metropolitan Edison Company
ATTN: Mr. R. C. Arnold
Vice President
Post Office Box 542
Reading, Pennsylvania 19603

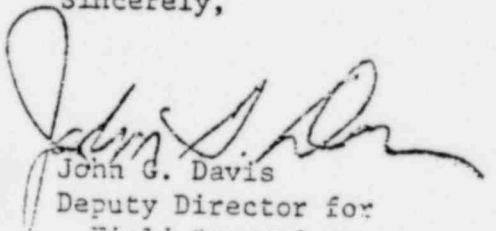
Gentlemen:

This concerns a letter dated February 10, 1975, (copy enclosed as Attachment A) to you from our Region I Office in King of Prussia Pennsylvania, which indicated that your response in a letter dated January 20, 1975, to Item 4 of a Notice of Violation which was sent to you on December 20, 1974, was not considered an adequate response and was being referred to this office for resolution. Item 4 of the Notice of Violation concerns the manner in which fish were sampled as part of the fish impingement study.

We have reviewed your reply of January 20, 1975, and have discussed the matter with respect to the requirements of Section 4.1.1.A of Appendix B of the Technical Specifications for Three Mile Island Unit 1 with the Division of Reactor Licensing, Office of Nuclear Reactor Regulation. As a result of this review and discussion we understand that Mr. R. Bevan, of the Environmental Projects staff of Reactor Licensing, has discussed this matter with Mr. S. Lawyer, a member of your staff, and that action has been initiated to revise and clarify the requirements of Appendix B Technical Specification 4.1.1.A.

With the understanding that action is being taken to revise and clarify Technical Specification 4.1.1.A., we plan to take no further action at this time.

Sincerely,



John G. Davis
Deputy Director for
Field Operations
Office of Inspection
and Enforcement

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Enclosure:
As stated

DUPLICATE

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