

METROPOLITAN EDISON COMPANY  
JERSEY CENTRAL POWER AND LIGHT COMPANY  
PENNSYLVANIA ELECTRIC COMPANY  
GPU NUCLEAR  
THREE MILE ISLAND NUCLEAR STATION UNIT II

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Operating License No. DPR-73  
Docket No. 50-320  
Technical Specification Change Request No. 66

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The Technical Specification Change Request is submitted in support of Licensee's request to change Operating License No. DPR-73 for Three Mile Island Nuclear Station Unit 2. As a part of this request, proposed replacement pages for Appendix B are also included.

GPU NUCLEAR

By MB Rode  
Director, TMI-2

Sworn and subscribed to me this 10<sup>th</sup> day of October, 1989.

Erin M. Flowers  
Notary Public

Notarial Seal  
Erin M. Flowers, Notary Public  
Londonderry Twp., Dauphin County  
My Commission Expires Sept. 11, 1993

Member, Pennsylvania Association of Notaries

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

DOCKET NO. 50-320  
LICENSE NO. DPR-73

GPU NUCLEAR

This is to certify that a copy of Technical Specification Change Request No. 66 to Operating License DPR-73 for Three Mile Island Nuclear Station Unit 2 has been filed with the U.S. Nuclear Regulatory Commission and served to the chief executives of 1) Londonderry Township, Dauphin County, Pennsylvania; 2) Dauphin County, Pennsylvania; and 3) the designated official of the Commonwealth of Pennsylvania by deposit in the United States mail, addressed as follows:

Mr. Jay H. Kopp, Chairman  
Board of Supervisors of  
Londonderry Township  
R. D. #1, Geyers Church Road  
Middletown, PA 17057

Ms. Sally Klein, Chairperson  
Board of County Commissioners  
of Dauphin County  
Dauphin County Court House  
Harrisburg, PA 17120

Mr. Thomas M. Gerusky, Director  
Bureau of Radiation Protection  
PA Dept. of Environmental Resources  
P.O. Box 2063  
Harrisburg, PA 17120

GPU NUCLEAR

By JMB Roche  
Director, TMI-2

October 10, 1989

Date

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

Technical Specification Change Request (TSCR) No. 66

The Licensee requests that the attached changed pages of the Appendix B Technical Specification (Tech. Specs.) (i.e., pages 2-4 and 2-11) replace the corresponding pages in the Appendix B Tech. Specs.

Description of Change

The Appendix B Tech. Specs. requirements related to radioactive liquid and gaseous waste sampling and analysis of Strontium-89 (Sr-89) are being removed.

Reason for Change

The Appendix B Tech. Specs. require sampling and analysis for Sr-89 in both liquid and gaseous radioactive waste. Sr-89 is produced as a result of nuclear fission during reactor operation and has a 50.52 day half-life. The TMI-2 reactor has been shut down since the March 28, 1979, accident. Therefore, the Sr-89 generation has ceased and the Sr-89 concentration present at that time has decayed to less than detectable levels. In summary, there no longer exists a need to monitor Sr-89 and the Tech. Spec. requirements can be deleted.

Safety Evaluation Justifying Change

Sr-89 has decayed since the March 28, 1979, accident to the extent that this radionuclide is no longer present in measurable quantities. Therefore, it is no longer necessary to monitor this particular radionuclide. We will continue to monitor radioactive liquid and gaseous wastes in accordance with Tables 2.3-1 and 2.3-2, however, which will ensure that the health and safety of the public is not jeopardized.

No Significant Hazards Consideration

10 CFR 50.92 provides the criteria which the Commission uses to evaluate a No Significant Hazards Consideration. 10 CFR 50.92 states that an amendment to a facility license involves No Significant Hazards if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. Involve a significant reduction in a margin of safety.

The proposed change to delete the sampling and analysis requirements for Sr-89 in both liquid and gaseous radioactive waste from the TMI-2 Recovery Technical Specifications has no impact on the safety of the evolutions occurring at TMI-2. Since Sr-89 has a 50.52 day half-life and its production ceased on March 28, 1979, the quantity of Sr-89 present at that time has decayed to less than detectable levels over the more than 75 half-lives.

Therefore, the proposed changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The deletion of Sr-89 sampling and analysis requirements has no effect on the probability of an accident. The consequences of an accident cannot be increased by a radionuclide that is present in less than detectable levels.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated. The deletion of Sr-89 sampling and analysis requirements has no potential to create a new or different kind of accident.
3. Involve a significant reduction in a margin of safety. There is no impact on any margin of safety since the quantity of Sr-89 is at less than detectable levels.

Based on the above analysis, it is concluded that the proposed changes involve no significant hazards considerations as defined by 10 CFR 50.92.