

Three Mile Island Nuclear Station, Unit I  
Operating License No. DPR-50  
Docket No. 50-289

I. Technical Specification Change Request No. 93

The licensee requests that the attached changed Section 6 Figure 6-1 replace both Figure 6-1 Section 6 in the existing Technical Specifications Appendix A and Figure 8 in Section 5 of Appendix B.

II. Reason for Change Request

The attached Technical Specification Change Request reflects changes in the organizational structure for direction of operational and support activities for Three Mile Island Unit I. These changes increase and concentrate the technical resources and management strength being applied to all nuclear activities, including TMI Unit I, within the General Public Utilities system by the formation of the GPU Nuclear Group.

A. Organization

Following the TMI-II accident, Metropolitan Edison Company recognized, through its own and other investigations of the accident, that major organizational changes were desirable for more effective management control. These changes indicate Met-Ed's commitment to operational safety and provide significant improvement in the control of operational activities, and the technical management resources directing and supporting facility operations.

The GPU Nuclear Group will be formed by combining the technical and management resources of Met-Ed, Jersey Central Power and Light (JCP&L) and GPU Service Corporation Generation Divisions which are being applied to nuclear activities into a single organizational entity.

1. GPU Nuclear Group

The GPU Nuclear Group, through substantially increased total staffing, will strengthen the overall management and provide greatly increased technical resources for the restart of TMI Unit I, the recovery of TMI Unit II and the operation of Oyster Creek.

The primary objective of the GPU Nuclear Group is to operate and maintain the plant safely and in accordance with all applicable laws, NRC regulations, Technical Specifications and established procedures.

The formation of the Group will take advantage of the wealth of nuclear experience represented by management and technical staff from within the GPU Service Corporation, Metropolitan Edison Company and Jersey Central Power and Light. The Group is being further strengthened by the addition of experienced managers and professionals at all levels of the organization.

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Also, the GPU Nuclear Group will provide greater advantages of centralization of nuclear expertise including:

- The ability to focus greater expertise on any area on short notice.
- Increased proficiency under emergency conditions due to pre-existing working relationships.
- Personnel policies and procedures appropriate to nuclear activities.

There are senior management personnel with an average technical experience of over 20 years reporting to the head of the GPU Nuclear Group in the areas of:

- TMI-I Operations
- TMI-II Recovery
- Oyster Creek Operations
- Technical Functions
- Radiological and Environmental Controls
- Administration
- Construction and Maintenance
- Communications
- Nuclear Assurance

Various steps have been taken in this reorganization to strengthen key functions in the operation and support for Unit I. Examples of this are:

- The line management responsibilities for TMI Units I and II are completely separated.
- Each TMI unit is to the maximum extent feasible, to have direct control of the resources necessary for effective and safe conduct of plant activities.
- The head of the TMI-I Operations, Director TMI-I, is serving full time at TMI.
- The TMI-I operations organization specifically gives the Manager Unit I the responsibility for operations and maintenance and relieves him of the direction of administration, training, engineering, radiation protection and chemistry functions.
- The radiological control function for Unit I has been elevated so that it reports directly to the Director Radiological and Environmental Controls.
- The GPU Service Corporation, Metropolitan Edison Company, and Jersey Central Power and Light Quality Assurance and Control organizations are being merged, and Operating Quality Assurance for TMI/Oyster Creek will be their major function.

## 2. TMI-I Organization

The Director TMI-I utilizes the following management staff in

carrying out his responsibilities:

- Manager Plant Engineering
- Manager Unit I
- Manager Administration and Services

The Three Mile Island Nuclear Unit I organization as shown in Figure 6.1 will function in three principle areas under the managers listed above: Unit I, Plant Engineering and Administration and Services.

The Departments under the Manager Unit I will be responsible for the day-to-day quality of operations and maintenance activities associated with the unit. Unit I will have Shift Supervisors assigned only to Unit I, who report to the Unit I Operations Supervisor directing the operations on each of six shifts through the assigned Unit I Shift Foreman, Control Room Operators, and Auxiliary Operators. A maintenance force supporting TMI-I on both a shift and a day basis in the areas of electrical, mechanical and instrument control maintenance and surveillance will also report to the Manager Unit I through the Unit I Superintendent Maintenance.

The TMI-I Plant Engineering Group under the Manager Plant Engineering includes engineers in nuclear, mechanical, electrical and instrument and control engineering disciplines to whom other engineers and analysts assigned to TMI-I will report. Shift Technical Advisors with engineering degrees are assigned to each of the six operating shifts to provide on shift safety support to the Shift Supervisor. He will also provide technical liaison and coordination between operating shift personnel and the plant engineering and Technical Functions Group staffs. The Administration and Services group will function in the areas of facilities, budgets/cost control, personnel and station security, procedure coordination, and general administration with direct support and guidance from the Administrative Division.

Further information concerning the unit staff is included in the TMI-I Restart Report Section 5.

#### B. Responsibilities

Pages 1 through 9 set forth the Summary of Responsibilities and Major Functions of the various Divisions of the GPU Nuclear Group. While it may be necessary to make adjustments in the distribution of responsibilities within the organization, no reduction in accountability or authority of the GPU Nuclear Group organization as a whole will be initiated without prior approval of the Nuclear Regulatory Commission.

### III. Safety Evaluation Justifying the Change

This change describes the Nuclear Generation Group and provides no loss of

function performed under the current Section 6 of the Technical Specifications. These changes increase and concentrate the technical resources and management strength being applied to all nuclear activities by the formation of the GPU Nuclear Group.

Futhermore, it has been determined that:

1. The probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report is not increased.
2. The possibility of an accident or malfunction of a different type than any evaluated previously in the safety analysis report is not increased.
3. The margin of safety defined in the basis of any Technical Specification is not reduced.

IV. Amendment Classification (10 CFR 170.22)

This change is administrative in nature and has no environmental or safety issues and can be considered a Class II License Amendment. Therefore, enclosed please find the prescribed remittance of \$1200.00.