# METROPOLITAN EDISON COMPANY JERSEY CENTRAL POWER AND LIGHT COMPANY PENNSYLVANIA ELECTRIC COMPANY

GPU NUCLEAR

THREE MILE ISLAND NUCLEAR STATION UNIT II

Operating License No. DPR-73

Docket No. 50-320

Technical Specification Change Request No. 38

This 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.

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Sworn and subscribed to before me this 25th day of August , 1982.

Notary Public

DARLA JEAN BERRY, NOTARY PUBLIC
MIDDLETOWN BORO, DAUPHIN COUNTY
MY COMMISSION EXPIRES JUNE 17, 1985
Member, Pennsylvania Association of Notaries

### UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

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

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This is to certify that a copy of Technical Specification Change Request No. 38 to Operating License DPR-73 for Three Mile Island Nuclear Station Unit 2, 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. Jay H. Kopp, Chairman Board of Supervisors of Londonderry Township R. D. #1, Geyers Church Road Middletown, Pennsylvania 17057 Mr. John E. Minnich, Chairman Board of County Commissioners of Dauphin County Daupnin County Court House Harrisburg, Pennsylvania 17120

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

#### I. Technical Specification Change Request No. 38

The licensee requests that the attached pages, 3-1 through 20 and 4-1 through 6 of the TMI-2 Technical Specifications, Appendix B (attachment A), replace the existing Technical Specification pages 3-1 through 20 and 4-1 through 6

#### II. Reason for Change

This change is requested to reduce and modify those parts of Appendix B which consist of non-radiological monitoring requirements and studies.

Thermal characteristic of cooling water discharge (3.1.1.a(1)), pH (3.1.1.a(2)), biocide (3.1.1.a(3)) and chemical release inventory are monitoring requirements which are activites duplicated with the facility's NPDES permit. The residual chlorine study program (4.1), thermal plume mapping (4.2) and hydraulic effects (4.3) also represent duplicate activities imposed upon Three Mile Island Nuclear Station (TMINS) by the NPDES permit. Erosion control inspections (4.4) and herbicide application (4.5) represent studies in which the activities have historically shown no significant impact upon the environment. Additionally, the use of herbicides is regulated by the United States Environmental Protection Agency and the Pennsylvania Department of Environmental Resources (PaDER), while PaDER also regulates soil erosion control.

This request would allow the licensee to use an aquatic monitoring program. recognizing the existing and substantial data base developed by previous aquatic programs for TMINS since 1974. Such a program has been developed and is presented as Attachment B to this request. It is not the intent of the proposed program to duplicate the extensive monitoring studies which were necessary during the assessment stage of operational TMINS.

Rather, the proposed monitoring modifications for water quality analysis (3.1.1.a(4)), benthic macroinvertebrates (3.1.2.a(1)(a)), ichthyoplankton (3.1.2.a(1)(b)) and fish (3.1.2.a(1)(c)) are designed to efficiently supplement the extensive data base, which now exists.

#### III. Environmental Evaluation Justifying Change

Many of the environmental monitoring requirements of the present Technical Specifications for Appendix B are redundant with policies and activities also imposed upon TMINS by the PaDER. Their removal from the Technical Specifications will avoid unnecessary duplication of effort.

The Technical Specifications, changed to reflect the attached proposal, would continue to confirm the continued absence of adverse environmental impact from TMINS upon the Susquehanna River, and ensure a moderate continuity of the scientific data base on the aquatic resources of the Susquehanna River in the vicinity of TMINS. Additionally, such a program would continue to supply base data regarding effects of the discharge of processed water, if any, should this means of disposition be chosen.

#### IV. Amendment Class (10 CFR 170)

The licensee has determined that the proposed change consists of a single safety issue and this constitutes a Class III change. Therefore, enclosed please find a check for \$4,000.00.