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April 19, 1994  
 C311-94-2031

U. S. Nuclear Regulatory Commission  
 Attention: Document Control Desk  
 Washington, DC 20555

Dear Sir:

Subject: Three Mile Island Nuclear Generating Station, Unit 1 (TMI-1)  
 Operating License No. DPR-50  
 Docket No. 50-289  
 Technical Specification Change Request (TSCR) No. 237  
 QA Audit Frequencies

In accordance with 10 CFR 50.4(b)(1), enclosed is Technical Specification Change Request No. 237.

Also enclosed is the Certificate of Service for this request certifying service to the chief executives of the township and county in which the facility is located, as well as the designated official of the Commonwealth of Pennsylvania, Bureau of Radiation Protection.

The purpose of this TSCR is to request the deletion of the audit program frequency requirements from the Technical Specifications and to utilize the Operational Quality Assurance (OQA) Plan as the controlling document. This change will introduce flexibility into audit scheduling to consider plant activities and performance.

The OQA Plan is part of GPU Nuclear's Safety Analysis Report (SAR) and subject to the provisions of 10 CFR 50.54(a). A formal review of the changes was conducted considering the requirements of 10 CFR 50.54(a). The review concluded that measures being introduced enhance the overall program. However, in a quantitative sense, the changes represent a reduction in commitment. Therefore, the changes to the OQA Plan are being submitted with this TSCR for review and approval. The 10 CFR 50.54(a) analysis and the revised OQA Plan pages are attached. Furthermore, since the OQA Plan applies equally to the Oyster Creek Nuclear Generating Station, a TSCR to Operating License No. DPR-16 is being submitted concurrently. If the amendments are approved, GPU Nuclear will submit similar changes to the TMI Unit 2 Technical Specifications and the PDMS QA Plan.

GPU Nuclear considers this TSCR to be a Cost Beneficial Licensing Action (CBLA). It is estimated that implementation of this change could result in a savings of \$1.15 million for the duration of the current license.

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Pursuant to 10 CFR 50.51(a)(1), enclosed is our analysis, applying the standards in 10 CFR 50.92 to make a determination of no significant hazards considerations. As stated above, pursuant to 10 CFR 50.91(a), we have provided a copy of this letter, the proposed change in Technical Specifications, and our analyses of significant hazards considerations to Robert Barkanic, the designated representative of the Commonwealth of Pennsylvania.

Sincerely,



T. G. Broughton  
Vice President and Director, TMI

DK/plp

Attachments

cc: Administrator, Region I  
TMI Senior Resident Inspector  
TMI-1 Senior Project Manager