



UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF  
GPU NUCLEAR CORPORATION

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

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 237 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with executives of Londonderry Township, Dauphin County, Pennsylvania; Dauphin County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Daryl LeHew, Chairman  
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Mr. Russel L. Sheaffer, Chairman  
Board of County Commissioners  
of Dauphin County  
Dauphin County Courthouse  
Harrisburg, PA 17120

Director, Bureau of Radiation Protection  
Attn: Mr. Robert Barkanic  
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GPU NUCLEAR CORPORATION

BY: J. J. Broughton  
Vice President and Director, TMI

DATE: April 19, 1994

## I. Technical Specification Change Request (TSCR) No. 237

GPU Nuclear requests that the following changed replacement pages be inserted into existing Technical Specifications:

Delete the existing pages 6-7 and 6-8 and replace them with the attached revised pages 6-7 and 6-8.

## II. Reasons for Change

Section 6.5.3 of the Technical Specifications contains the audit program requirements. Areas to be audited and audit frequencies are specified. Because these requirements are in the Technical Specifications, there is little flexibility to adjust the audit program to make the audits more meaningful. Audits are required to be performed regardless of activities in progress. For example, the audit of processing and packaging of radioactive waste is required when due even if minimal processing and packaging is being performed the month it is due and considerable processing and packaging will be performed the following month. Some activities are conducted only during refueling outages, so it is sensible to audit those activities during refueling outages rather than ongoing activities according to a non-flexible schedule. The Technical Specifications do not preclude adding an extra audit to cover an activity during a refueling outage, but it does prevent delaying an audit to either catch or avoid a refueling outage. Similarly, the limited flexibility can lead to auditing an activity prior to corrective action completion when the audit could have assessed the effectiveness of the corrective action if it were postponed a short time. Furthermore, the current audit program requirements can consume resources for auditing areas without problems which would be better used in monitoring and assessing weak areas or areas of decreasing performance before they become weak areas.

The proposed Technical Specification change deletes the audit program frequency requirements from the Technical Specifications and relocates them to the Operational Quality Assurance (OQA) Plan. In addition, the maximum interval for some audit frequencies are being increased. This change to the OQA Plan is being pursued concurrently.

## III. Safety Evaluation Justifying Change

The proposed change concerns audit frequency requirements. A fixed, inflexible schedule of audit requirements is being replaced with a more flexible scheduling mechanism. The areas and activities to be audited and the scope of the audits performed are unaffected by this change. In lieu of a prescriptive, unchangeable schedule, audits will be conducted within relatively flexible parameters based on the performance of the subject area. In this way resources can be focused on weak areas and areas of declining performance. Areas with consistently high performance can be audited less frequently while still within the parameters.

The maximum interval between audits for four of the thirteen subject areas has been extended to twenty-four (24) months and in two other cases the maximum interval has been extended to thirty-six (36) months. For those areas with a nominal twenty-four (24) month interval, a six month grace period will be introduced. No grace period will be permitted for those areas with a maximum interval of thirty-six (36) months. Each audit will consider the nonconformance and corrective action system in

addition to the subject area audit that will be done on a twenty-four month basis. Furthermore, each subject area, regardless of interval, will be reviewed on an annual basis to determine when the next audit should be conducted. Recent performance as evidenced by any Notices of Violation (NOV), Licensee Event Reports (LER), assessment results by independent parties, self assessment activities and deficiency trending data will be key factors in this review. These factors and others will constitute an assessment of the performance of each area and substantiate the projected audit schedule or determine the need to modify it. In this manner the overall quality of the audit program will be enhanced.

There are several activities for which the audit frequency is mandated by regulation. For those activities GPU Nuclear will continue to meet the specified schedule unless a specific exemption is sought and granted.

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 proposed changes was made considering the requirements of 10 CFR 50.54(a). That review concluded that the additional measures being introduced enhance the overall program. However, the changes represent a reduction of commitment in a quantitative sense. Therefore, the revisions to the OQA Plan are being submitted to the NRC concurrently with this TSCR.

#### IV. No Significant Hazards Consideration

GPU Nuclear has determined that this TSCR poses no significant hazard as defined by the NRC in 10 CFR 50.92.

1. These changes do not affect the function of any system or component. Therefore, they do not increase the probability of occurrence or consequence of an accident previously evaluated in the SAR.
2. These changes do not involve a physical change to plant configuration and they do not affect the performance of any equipment. Therefore, they do not create the possibility of an accident or malfunction of a different type than previously identified.
3. The shifting of the audit frequency requirements from the Technical Specifications to the OQA Plan and the extension of the maximum interval between audits of certain areas do not change the activities to be audited nor the scope of individual audits. Furthermore, audit frequencies are not associated with the margin of safety in the bases of any Technical Specification. Therefore, the margin of safety is not affected by this change.

#### V. Implementation

It is requested that the amendment authorizing this change be effective 30 days after issuance to allow changes in procedures to be made.