METROPOLITAN EDISON COMPANY JERSEY CENTRAL POWER & LIGHT COMPANY

AND

PENNSYLVANIA ELECTRIC COMPANY

THREE MILE ISLAND NUCLEAR STATION UNIT II

Operating License No. DPR-73
Docket No. 50-320
Technical Specification Change Request No. 34

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.

METROPOLITAN EDISON COMPANY

Senior Vice President

Sworn and subscribed to me this 15th day of December, 1981.

Notary Public
DANLA JEAN BERRY, NOTARY PUBLIC

DARLA JEAN BERRY, NOTARY PUBLIC
MIDDLETOWN BORO, DAUPHIN COUNTY
WY COMMISSION EXPIRES JUNE 17, 1985
Manufacture Flansylvania Association of Notaries

UNITED STATES OF AMERICA NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF

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

METROPOLITAN EDISON COMPANY

This is to certify that a copy of Technical Specification Change Request No. 34 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 Dauphin County Court House Harrisburg, Pennsylvania 17120

METROPOLITAN EDISON COMPANY

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Senior Vice President

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

I. Technical Specification Change Request No. 34

The licensee requests that the attached page 5-5 of the TMI-II Technical Specifications, Appendix B, replace the existing Technical Specification page 5-5.

II. Reason For Change

The change is requested to make the subject requirements consistent with the current onsite and offsite organizations. The change also reflects the requirements of Section 6 of Appendix A to the TMI Technical Specifications. The change is necessary in that the positions of Manager-Generation Engineering and Manager-Operational Quality Assurance no longer exist. Updating of this Section was overlooked when the Recovery Technical Specifications were issued. This change also clarifies the responsibility for review of changes related to Appendix B Specifications and their implementation.

III. Safety Evaluation Justifying Change

There is no effect on the health and safety of the public or the safety of the plant. This change does not delete the requirement for independent review of changes. It only reflects changes to the organization of TMI-II, which existed at the time the Recovery Technical Specifications were issued but were not incorporated into the Recovery Technical Specifications. The change is administrative only in nature, and as such, will have no effect on safety.

IV. Amendment Class (10CFR70)

The licensee has determined that because the proposed Technical Specification involves an administrative change and does not have safety significance, the change constitutes a Class II License Amendment (per 10CFR 170.22). A fee of \$1,200.00 is applicable. Therefore, enclosed please find a check for \$1,200.00.

5.5.4 Changes in Procedures, Station Design or Operation

Changes in procedures, station design or operation as described in Section 2 and 5 of Appendix B may be made subject to conditions described below, provided such changes are reviewed by the Plant Operations Review Committee and approved by the Manager, Site Operations prior to implementation. Changes to monitoring programs and special studies as described in Section 3 and 4 may be made subject to the conditions described below, and must be reviewed and approved by the Manager, Environmental Controls prior to implementation.

- A. The licensee may (1) make changes in the station design and operation, (2) make changes in the procedures described in the document developed in accordance with Subsection 5.5.1, and (3) conduct tests and experiments not described in the document developed in accordance with Subsection 5.5.1, without prior Commission approval, unless the proposed change, test or experiment involves a change in the objectives of the ETS, an unreviewed environmental question, or affects the requirements of Subsection 5.5.5.
- 8. A proposed change, test or experiment shall be deemed to involve an unreviewed environmental question if it concerns (1) a matter which may result in a significant increase in any adverse environmental impact previously evaluated in the final environmental impact statement as modified by staff's testimony to the Atomic Safety and Licensing Board, supplements thereto, environmental impact appraisals, or in initial or final adjudicatory decisions; or (2) a significant change in effluents or power level as specified in § 51.5(b)(2); or (3) a matter not previously reviewed and evaluated in the documents specified in (1) of this section which may have a significant adverse environmental impact.
- C. The licensee shall maintain records of changes in procedures and in facility design or operation made pursuant to this Subsection, to the extent that such changes constitute changes in procedures as described in the document developed in accordance with Subsection 5.5.1 and initially approved by the NRC. The licensee shall also maintain records of tests and experiments carried out pursuant to paragraph "A" of this Subsection. These records shall include a written evaluation which provides the bases for the determination that the change, test, or experiment does not invlove an unreviewed environmental question of substantive impact or constitute a change in the objectives of these ETS, or affects the requirements of Subsection 5.5.5 of these ETS. The licensee shall furnish to the Commission, annually or at such shorter intervals as may be specified in the license, a report containing descriptions, analyses, interpretations, and evaluations of such changes, tests and experiments.
- D. Changes in the program description document developed in accordance with Subsection 5.5.1 which affect sampling frequency, location, gear, or replication shall be reported to the NRC within 30 days after their implementation, unless otherwise reported in accordance