



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 197 TO FACILITY OPERATING LICENSE NO. DPR-50

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER & LIGHT COMPANY
PENNSYLVANIA ELECTRIC COMPANY
GPU NUCLEAR CORPORATION

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1

DOCKET NO. 50-289

1.0 INTRODUCTION

By letter dated June 1, 1995, as supplemented August 23, 1995, the GPU Nuclear Corporation (the licensee) submitted a request for changes to the Three Mile Island Nuclear Station, Unit No. 1 (TMI-1) Technical Specifications (TS). The licensee proposed to incorporate programmatic controls for radiological effluents and radiological environmental monitoring in the Administrative Controls section of the TS consistent with the requirements of Section 20.1302 of Title 10 of the Code of Federal Regulations (10 CFR 20.1302), 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50. At the same time, the licensee proposed to transfer the procedural details of the Radiological Effluent Technical Specifications (RETS) from the TS to the Offsite Dose Calculation Manual (ODCM). With these changes, the specifications related to RETS reporting requirements were simplified. Finally, changes to the definition of the ODCM was proposed to make the definition consistent with these changes. Guidance on these proposed changes was provided to all power reactor licensees and applicants by Generic Letter (GL) 89-01, dated January 31, 1989. The August 23, 1995, letter provided clarifying information that did not change the initial proposed no significant hazards consideration determination.

2.0 EVALUATION

10 CFR 50.36 established the regulatory requirements related to the content of TS. The rule requires that technical specifications include items in specific categories, including safety limits, limiting conditions for operation, and surveillance requirements; however, the rule does not specify the particular requirements to be included in a plant's TS. The NRC developed criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors," (58 FR 39132) to determine which of the design conditions and associated surveillances need to be located in the TS because the requirement is "necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." Briefly, those criteria are (1) detection of abnormal degradation of the reactor coolant pressure boundary, (2) boundary conditions for design basis accidents and transients, (3) primary success paths to

mitigate design basis accidents and transients, and (4) functions determined to be important to risk or operating experience. The Commission's final policy statement acknowledged that its implementation may result in the relocation of existing technical specification requirements to licensee-controlled documents and programs.

The licensee's proposed changes to the TS are in accordance with the guidance provided in GL 89-01 and are addressed below.

- (1) The licensee has proposed to incorporate programmatic controls for radioactive effluents and radiological environmental monitoring in TS 6.8.3, Procedures and Programs, as noted in the guidance provided in GL 89-01. The programmatic controls ensure that programs are established, implemented, and maintained to ensure that operating procedures are provided to control radioactive effluents consistent with the requirements of 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50.
- (2) The licensee has confirmed that the detailed procedural requirements addressing Limiting Conditions for Operation, their applicability, remedial actions, or associated surveillance requirements for the following TS were prepared to implement the relocation of these procedural details to the ODCM. These changes to the ODCM were prepared in accordance with the new Administrative Controls in the TS on changes to the ODCM so that they will be implemented in the ODCM when this license amendment is issued.

SPECIFICATION TITLE

3/4.21.1	RADIOACTIVE LIQUID EFFLUENT INSTRUMENTATION
3/4.21.2	RADIOACTIVE GASEOUS PROCESS AND EFFLUENT MONITORING INSTRUMENTATION
3/4.22.1.1	LIQUID EFFLUENTS CONCENTRATION
3/4.22.1.2	LIQUID EFFLUENTS DOSE
3/4.22.1.3	LIQUID RADWASTE TREATMENT SYSTEM
3/4.22.1.4	LIQUID HOLDUP TANKS
3/4.22.2.1	GASEOUS EFFLUENTS DOSE RATE
3/4.22.2.2	RADIOACTIVE EFFLUENTS DOSE - NOBLE GASES
3/4.22.2.3	GASEOUS EFFLUENTS DOSE - IODINE-131, IODINE-133, TRITIUM, AND RADIONUCLIDES IN PARTICULATE FORM
3/4.22.2.4	GASEOUS EFFLUENTS GASEOUS TREATMENT
3/4.22.2.5	GASEOUS EFFLUENTS EXPLOSIVE GAS MIXTURE
3/4.22.2.6	GASEOUS EFFLUENTS WASTE GAS DECAY TANKS
3/4.22.4	RADIOACTIVE EFFLUENTS TOTAL DOSE

In addition, the bases associated with the above listed TS will be deleted.

The procedural details removed from the TS are not required by the Commission's regulations to be included in the TS. They were prepared for incorporation in the ODCM upon issuance of this license amendment and may be subsequently changed by the licensee without prior NRC approval. Changes to the ODCM are documented and are retained for the duration of the operating license.

- (3) The licensee has proposed replacing the following TS in the administrative controls section of the TS with the updated TS provided by GL-89-01:

SPECIFICATION TITLE

6.8.4 RADIOLOGICAL ENVIRONMENTAL MONITORING PROGRAM

The staff finds that the changes included in the proposed TS amendment request are consistent with the guidance provided in GL 89-01. Because the control of radioactive effluents continues to be limited in accordance with operating procedures that must satisfy the regulatory requirements of 10 CFR 20.1302, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50, the NRC staff concludes that these changes are administrative in nature and there is no impact on plant safety as a consequence. Accordingly, the staff finds the proposed change acceptable.

On this basis, the staff concludes that the procedural details of the RETS do not need to be controlled by TS, and changes to the RETS are adequately controlled by 10 CFR 50.59, "Changes, tests, and experiments." Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, NRC approval and a license amendment would be required prior to implementation of the change. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to Updated Final Safety Analysis Report commitments and to take any remedial action that may be appropriate.

The staff has concluded, therefore, that relocation of the RETS is acceptable because (1) their inclusion in technical specifications is not specifically required by 10 CFR 50.36 or other regulations, (2) the RETS are not required to avert an immediate threat to the public health and safety, and (3) changes that are deemed to involve an unreviewed safety question, will require prior NRC approval in accordance with 10 CFR 50.59(c).

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Pennsylvania State official was notified of the proposed issuance of the amendment. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The amendment also relates to changes in recordkeeping, reporting, or administrative procedures or requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (60 FR 35078). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and (10). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

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Date: October 2, 1995