

METROPOLITAN EDISON COMPANY  
JERSEY CENTRAL POWER & LIGHT COMPANY  
AND  
PENNSYLVANIA ELECTRIC COMPANY  
THREE MILE ISLAND NUCLEAR STATION, UNIT 1

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Operating License No. DPR-50  
Docket No. 50-289  
Technical Specification Change Request No. 218

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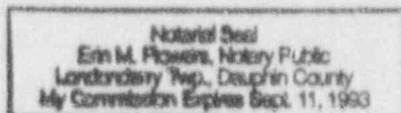
This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1. As a part of this request, proposed replacement pages for Appendix A are also included.

GPU NUCLEAR CORPORATION

BY: J. J. Broughton  
Vice President and Director, TMI-1

Signed and sworn before me this  
22<sup>nd</sup> day of July, 1992.

Erin M. Flowers  
Notary Public



Member, Pennsylvania Association of Notaries

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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. 218 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. Jay H. Kopp, Chairman  
Board of Supervisors of  
Londonderry Township  
R. D. #1, Geyers Church Road  
Middletown, PA 17057

Mr. Russell L. Sheaffer, Chairman  
Board of County Commissioners  
of Dauphin County  
Dauphin County Courthouse  
Harrisburg, PA 17120

Mr. William P. Dornsife, Acting Director  
PA. Dept. of Environmental Resources  
Bureau of Radiation Protection  
P.O. Box 2063  
Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY: *J. J. Braughton*  
Vice President and Director, TMI-1

DATE: July 22, 1992

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 218

GPUN requests that the attached revised page replace page 6-3 of the TMI-1 Technical Specifications.

II. REASON FOR CHANGE

This request involves an administrative change to the TMI-1 Technical Specifications for Unit Staff Qualifications. Presently, licensed operators are required to meet the supplemental requirements of Section A and C of Enclosure 1 to an NRC letter from Denton to all licensees dated March 28, 1980 (The "Denton Letter" reference 1). The prescriptive requirements of the letter were included in the TMI-1 Technical Specifications in Section 6.4 Training and Section 6.3 Unit Staff Qualifications.

Subsequent to the issuance of the Denton Letter, the guidance contained in the letter was incorporated into a variety of regulatory guidance and finally a portion of it was included in 10 CFR 55.59(c).

Consistent with the guidance in 10 CFR 55.59, the TMI-1 Licensed Operator Requalification (LOR) Program was transferred from a set of regulatory-based performance criteria to one with SAT based (Systems Approach to Training) performance criteria. The LOR program was certified to the NRC in Reference 2 as being SAT based.

Under the SAT based program, 10 CFR 55.59(c) provides relief from Sections (2), (3) and (4) of 55.59 (c) which prescribed the content of the LOR program (The Denton Letter, section C of Enclosure I). In effect the requirements of the Denton Letter (Enclosure I, Section C) were superseded by 10 CFR 55 and the SAT process.

Additionally, 10 CFR 55.31(a)(4) states that facilities with certified simulators and programs using the SAT process need not provide a detailed accounting of candidate experience. References 3 and 4 elaborate, stating that such a facility may establish a process for determining eligibility. TMI-1 has implemented a program to establish candidate eligibility thru various administrative procedures (references 5 and 6) and the FSAR, Chapter 12.1. This program addresses candidate eligibility requirements.

A Technical Specification change was completed which updated Section 6.4, Training (Amendment No. 139) but Section 6.3 was not corrected. This change deletes the reference to the requirements of the Denton Letter in Section 6.3.1 as these requirements are now prescribed by regulations in 10 CFR 55.

### III. SAFETY EVALUATION JUSTIFYING CHANGE

The proposed revised Technical Specification Section 6.3.1 is consistent with the regulatory requirements stated in 10 CFR 55.31(a)(4), 55.45(b)(1) and 55.59(c). These parts of the regulations allow licensee discretion in the requalification program content and also allow discretion in establishing licensed operator eligibility if certain conditions are met. These conditions are that licensees must have a Systems Approach to Training (SAT) based training program and have a certified simulator facility both of which exist at TMI-1.

This proposed change will also make the TMI-1 Technical Specifications consistent in that a change has already been issued to Section 6.4, Training, which specifies that Licensed Operator Training meet the requirements of 10 CFR Part 55. This change does not in any way change the manner in which training will be conducted or the manner in which personnel are selected for qualification. The program will continue to comply with applicable portions of 10 CFR Part 55.

### IV. NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPUN has determined that this Technical Specification Change Request involves no significant hazards consideration as defined by NRC in 10 CFR 50.92.

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or the consequences of an accident previously evaluated. This proposed change is an administrative change that will result in Technical Specifications that accurately represent the present methods of establishing licensed operator qualifications and maintaining adequate training and requalification. These methods are in compliance with appropriate regulatory requirements that are specified in 10 CFR, Part 55.
2. Operation of the facility in accordance with the proposed amendment would not create the possibility of a new or different kind of accident from any accident previously evaluated. This is an administrative change and will not modify plant hardware or change methods of operation. The facility will continue to be operated within the limits of existing accident analysis and margins of safety.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety since the change contained in the proposed amendment does not change any existing safety margins.

V. REFERENCES

1. March 28, 1980 NRC letter to all licensees from H. R. Denton "Qualifications of Reactor Operators"
2. TMI-1 letter, C311-88-2066, dated May 19, 1988, "Certification of TMI-1 Licensed Operator Requalification Program"
3. NUREG-1262 Answers to Questions at Public Meetings Regarding Implementation of Title 10, Code of Federal Regulations, Part 55 on operator Licenses
4. Reg-Guide 1.9 - Qualifications and Training of Personnel for Nuclear Power Plants
5. TMI-1 Procedure, 6211-PGD-2610 Rev. 6, TMI-1 Senior Reactor Operator Training Program
6. TMI-1 Administrative Procedure, AP-1058 Rev. 7, Operator Licenses

VI. IMPLEMENTATION

It is requested that the amendment authorizing this change become effective upon issuance.