

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

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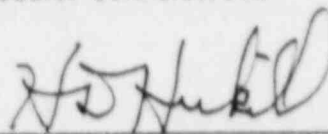
Operating License No. DPR-50  
Docket No. 50-289  
Technical Specification Change Request No. 177

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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.

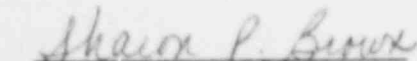
GPU NUCLEAR CORPORATION

BY:



Vice President and Director TMI-1

Sworn and Subscribed  
to before me this 29th  
day of January, 1988.

  
Notary public

SHARON P. BROWN, NOTARY PUBLIC  
MIDDLETON TOWNSHIP, DAUPHIN COUNTY  
MY COMMISSION EXPIRES JUNE 12, 1989  
Member, Pennsylvania Association of Notaries

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I. TECHNICAL SPECIFICATION CHANGE REQUEST NO. 177

GPUN requests that the attached revised pages (Attachment I) replace pages 1-7a, 6-4, 6-11, 6-19, and 6-20 in the TMI-1 Technical Specifications.

II. REASON FOR CHANGE

Technical Specification Change Request No. 177 provides clarification of the existing requirements for technical and safety review of procedures, modifications to unit structures, systems and components, and proposed tests and experiments. TSCR No. 177 also provides more consistent terminology with NUREG 0103 "Standard Technical Specifications for Babcock and Wilcox Pressurized Water Reactors" Rev. 4.

III. SAFETY EVALUATION JUSTIFYING CHANGE

TSCR No. 177 includes changes to Technical Specifications 1.22, 6.5.1.1, 6.5.1.3, 6.5.1.4., 6.8.1, 6.8.2, 6.10.1 and 6.10.2. These changes are administrative in nature, and provide clarification of existing requirements as well as terminology more consistent with that of the Standard Technical Specifications for Babcock and Wilcox Pressurized Water Reactors. These proposed changes will not result in changes to existing requirements for technical and safety review. Each of these sections is addressed individually in the following paragraphs.

1.22

Proposed Specification 1.22 provides definition of substantive changes, which is a term used in Technical Specifications 6.5.1.1 and 6.8.2. This change is provided for clarification.

6.5.1.1

Proposed Specification 6.5.1.1 requires that each procedure required by Technical Specification 6.8 and other procedures which affect nuclear safety, and substantive changes thereto, shall be prepared by a designated individual(s)/group knowledgeable in the area affected by the procedure. Each such procedure, and each such change thereto, shall be reviewed for adequacy by an individual(s)/group other than the preparer, but who may be from the same organization as the individual who prepared the procedure or change. This change provides clarification of existing Technical Specification requirements.

#### 6.5.1.3

Proposed Specification 6.5.1.3 requires that proposed modifications, that affect nuclear safety, to unit structures, systems and components, shall be designed by an individual/organization knowledgeable in the areas affected by the proposed modification. This change provides clarification of existing Technical Specification requirements and is consistent with the terminology of Standard Technical Specification 6.5.1.6d.

#### 6.5.1.4

Proposed Specification 6.5.1.4 requires that proposed tests and experiments that affect nuclear safety shall be reviewed by a knowledgeable individual(s)/group other than the preparer but who may be from the same division as the individual who prepared the tests and experiments. This change provides clarification and is consistent with Standard Technical Specification 6.5.1.6b.

#### 6.8.1

Proposed Specification 6.8.1 specifies that written procedures shall be established, implemented and maintained in areas referenced therein, and including surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment. These changes provide clarification of the existing Technical Specification requirements, and provide terminology more consistent with Standard Technical Specification 6.8.1.

#### 6.8.2

Proposed Specification 6.8.2 specifies that each procedure required by Specification 6.8.1, and substantive changes thereto, shall be reviewed and approved as described in Specification 6.5.1 prior to implementation. This change clarifies that nonsubstantive changes, which by their definition are precluded from having any effect on safety, are excluded from Technical Specification requirements for technical and safety review.

#### 6.10.1

Proposed Specification 6.10.1 specifies retention of records for at least five years including the following:

- b. Records of principal maintenance activities, including inspection, repairs, substitution, or replacement of principal items of equipment related to nuclear safety.

- e. Records of reactor physics tests and other special tests related to nuclear safety.
- f. Changes to procedures required by Specification 6.8.1.

The changes provide clarification, and terminology consistent with Standard Technical Specification 6.10.1.

#### 6.10.2

Proposed Specification 6.10.2 specifies retention of records for the duration of the Operating License including records of transient or operational cycles for those facility components which affect nuclear safety for a limited number of transients or cycles as defined in the Safety Analysis Report. This change provides clarification of existing requirements.

The currently existing Technical Specification 6.10.2.k calls for retention of records of reviews by the Independent Onsite Safety Review Group (previously Plant Operations Review Committee and General Office Review Board Minutes). Proposed Technical Specification 6.10.2.k deletes parenthetical references to the Plant Operations Review Committee and General Office Review Board. This change is provided for clarification and represents no change to existing Technical Specification requirements.

A typographical error has been corrected in Technical Specification 6.10.2a.

#### IV. SIGNIFICANT HAZARDS CONSIDERATION

This proposed change is similar to Example (i) of the "Amendments not Likely to Involve Significant Hazards Consideration" from the Federal Register Vol. 48, No. 67 at 14870 on April 6, 1983.

This change is an administrative change to achieve terminology more consistent with the terminology of the Babcock and Wilcox Standard Technical Specifications, NUREG 0103 Rev. 4, and to provide clarification of previously existing requirements for technical and safety review. The proposed revised Technical Specifications would not involve significant hazards considerations for reasons as follows:

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.

The probability of occurrence or the consequences of previously evaluated accidents are not affected by this change since the change is administrative in nature, and provides clarification and consistency. The technical and safety review requirements for substantive changes in the existing Technical Specifications are not changed.

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.

The possibility of a new or different kind of accident from any accident previously evaluated is not created by this change, since the change is administrative in nature, and provides clarification and consistency. The technical and safety review requirements for substantive changes in the existing Technical Specifications are not changed.

3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

This change does not reduce the margin of safety, since the change is administrative in nature, and is provided for clarification and consistency. The technical and safety review requirements for substantive changes in the existing Technical Specifications are not changed.

#### V. IMPLEMENTATION

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

#### VI. AMENDMENT FEE

Pursuant to the provisions of 10CFR170.21, a check for \$150.00 is included with request.

1.21 REPORTABLE EVENTS

A REPORTABLE EVENT shall be any of those conditions specified in Section 50.73 to 10 CFR Part 50.

1.22 SUBSTANTIVE CHANGES

SUBSTANTIVE CHANGES are those which affect the activities associated with a document or the document's meaning or intent. Examples of non-substantive changes are: (1) correcting spelling; (2) adding (but not deleting) sign-off spaces; (3) blocking in notes, cautions, etc.; (4) changes in corporate and personnel titles which do not reassign responsibilities and which are not referenced in the Appendix A Technical Specifications; and (5) changes in nomenclature or editorial changes which clearly do not change function, meaning or intent.