



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 141 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 January 29, 1988, GPU Nuclear Corporation (GPUN) requested a revision to the Technical Specifications (TSs) for Three Mile Island Unit 1 (TMI-1). The TS change would revise various sections in Chapter 6 (Administrative Controls) for clarity and consistency with the B&W Standard Technical Specifications (NUREG-0103, Revision 4) insofar as the safety review process for new and revised procedures, modifications to structures, systems and components and for proposed tests and experiments. The change would also add a definition to Chapter 1 of the TSs for substantive changes to these activities.

In a separate and unrelated TS change request dated January 26, 1988, GPUN requested that the bases for Section 3.1.6 of the TS (Reactor Coolant System Leakage) be clarified to more clearly state why the limits exist, to state the methods of RCS Leakage detection and to provide additional background information. As stated in 10 CFR 50.36(a), the basis shall not become a part of the TSs; therefore, this change is included as a part of the proposed license amendment only for administrative efficiency and the GPUN request to modify the bases does not require a staff safety evaluation.

2.0 EVALUATION

Licenses are allowed by 10 CFR 50.59 to make changes in their facility (structures, systems and components) and procedures as described in the safety analysis report and to conduct tests and experiments not described in the safety analysis report without prior Commission approval as long as the change, test or experiment does not involve a TS change or an unreviewed safety question. This regulation also provides criteria for judging whether or not an unreviewed safety question might be involved in a proposed change, test or experiment. In order to assure appropriate provisions for compliance with 10 CFR 50.59, Section 6.5 of the TSs for most nuclear power plants lists specific requirements for technical review and audit of certain procedures and procedure changes (including those pertaining to tests and experiments)

and of facility modifications. GPUN Procedure 1000-ADM-1291.01 implements the safety review requirements of Section 6.5 of the TMI-1 TSs. On September 1, 1986, GPUN implemented a significant revision to this procedure which established a two-step process for review of procedure changes, facility modifications, tests and experiments. The first step of the process is to determine applicability of 10 CFR 50.59 to the contemplated action. Step two of the process is to provide a written safety evaluation of why the contemplated action does or does not involve a change to the TSs or an unreviewed safety question.

The existence of the words "important to safety" in the current TSs for TMI-1 have caused some confusion with respect to review of procedure changes and modifications. This confusion apparently stems in part from the industry-wide issue with the NRC's use and definition of the terms "important to safety" and "safety related" as discussed in detail in NRC Generic Letter No. 84-01 dated January 5, 1984. To eliminate this confusion and to upgrade the TMI-1 TSs terminology to be consistent with NUREG-0103, Revision 4, "Standards Technical Specifications for Babcock and Wilcox Pressurized Water Reactors," GPUN has proposed the term "affecting nuclear safety" as a substitute for "important to safety" in several places throughout Section 6.5.

Furthermore, GPUN has requested placing a definition for the word "substantive" in the TSs (Section 1.22) and adding the word to Sections 6.5.1.1 and 6.8.2 to make it clear that minor changes not affecting the function, meaning or intent of a document need not undergo the formal review process intended for substantive changes. GPUN's concern is that if the formal review process is literally applied to all changes, including correction of typographical errors and editorial improvements, the number of such reviews will become overwhelming and the substantive changes may not get the proper level of detail in their review. Philosophically the staff agrees with this distinction as long as the individuals exercising these judgements are adequately trained and objective. The staff met with GPUN on April 26, 1988 to discuss, in detail, implementation of the safety review process and GPUN Procedure 1000-ADM-1291.01 at TMI-1 and Oyster Creek. The staff concluded that, with a minor modification to the procedure, the method used by GPUN should provide acceptable results.

The specific TS changes addressed by this Safety Evaluation are as follows:

1.22 Provides addition of a definition of substantive changes to documents.

6.5.1.1 Replaces "important to safety" with "which affect nuclear safety" as applied to which procedures require preparation and review by a designated individual or group. Replaces "important to safety" with "substantive" in specifying to which procedure changes this section applies.

6.5.1.3 Replaces "important to safety" with "that affect nuclear safety" in conjunction with modifications to unit structures, systems and components and clarifies that those words apply to the proposed modification and not to the structures, system or component themselves.

6.5.1.4 Replaces "important to safety" with "that affect nuclear safety" in conjunction with tests and experiments.

6.8.1 Replaces "important to safety" with "that affects nuclear safety" in conjunction with written procedures for surveillance and test activities.

6.8.2 Replaces "important to safety" with "substantive" in conjunction with review of procedures required by Section 6.8.1.

6.10.1 Replaces "important to safety" with "related to nuclear safety" in conjunction with records retention associated with principal maintenance activities, tests and changes to procedures.

6.10.2 Replaces "important to safety" with "which affect nuclear safety" in conjunction with records retention associated with transient and operating cycles.

The staff finds that these proposed changes are consistent with the Standard Technical Specifications and are acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment changes administrative procedures and requirements. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

4.0 CONCLUSION

We have 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, and (2) such activities will be conducted in compliance with the Commission's regulations and the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Dated: June 3, 1988

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