

Enclosure 1

TMI-1 License Amendment Request 285 Safety Evaluation and No Significant Hazards
Consideration

I. LICENSE AMENDMENT REQUEST NO. 285

GPU Nuclear requests that the following change be made to the existing TMI-1 License:

A. Replacement page:

License page 3

This page is attached in enclosure 2. It is noted that the TMI-1 license transfer to AmerGen and the associated conforming Technical Specification amendment pages, which have been approved by the NRC in its Order dated April 12, 1999, and will be issued and made effective at the time the transfer is completed, revises the references to GPU Nuclear ownership contained in the attached page.

II. REASON FOR CHANGE AND MARKUP OF CHANGES

The purpose of this request is to clarify the authority to possess radioactive materials without unit distinction, so that after the transfer of the TMI-1 license to AmerGen, radioactive materials may continue to be moved between the TMI-1 and TMI-2 units as they currently are. Currently, while GPU Nuclear is the common licensee of TMI-1 and TMI-2, TMI-1 License conditions 2b(3) and 2b(4) allow movement of radioactive materials between the units and common facilities, including staging of contaminated apparatus used at either unit and temporary staging of radioactive material generated by the units. However, discussions with the NRC have suggested that, upon the TMI-1 license transfer to AmerGen, these license conditions should be amended to make it clear that radioactive materials may still be possessed without unit distinction at TMI after the license transfer.

The process of handling TMI-2 contaminated protective clothing and radwaste generated in TMI-2 includes temporarily staging these materials in the TMI-1 facility. Also, liquid radwaste processing involves movement between the units.

The requested changes are summarized as follows:

A. License condition 2b(3):

This paragraph is modified to allow AmerGen to receive and possess contaminated apparatus and components at either TMI-1 or TMI-2. This paragraph applies only to apparatus and components to be used at either facility and does not allow receipt and storage of radioactive waste from other sites.

B. License condition 2b(4):

This paragraph is modified to allow AmerGen to possess radioactive material in TMI-1 or TMI-2, which is produced by operations in either unit.

License page 3 Mark-up

- (3) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess **at either TMI-1 or TMI-2**, and use in amounts as required any byproduct, source, or special nuclear material without restriction to chemical or physical form, for sample analysis, testing, instrument calibration, or associated with radioactive apparatus or components;
- (5) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to possess **at the TMI Unit 1 or Unit 2 site**, but not separate, such byproduct and special nuclear materials as may be produced by the operation of **the facility either unit**.

III. SAFETY EVALUATION JUSTIFYING CHANGE

The existing TMI-1 license conditions do not limit GPU Nuclear's authority to possess radioactive materials used or generated at TMI-1, and it is generally understood that this authority allows the possession of these materials at the TMI Station (i.e. at either unit and common facilities). As a result of discussions with the NRC staff, it has been decided to request a revision of the TMI-1 license to confirm the continued permissibility of current practices associated with the movement and storage of radioactive materials on the TMI site, following the license transfer.

The handling and processing of contaminated clothing and radwaste has always been done using common processes and facilities at the TMI Station. Thus, radioactive materials generated at TMI-1 and TMI-2 are temporarily stored at and moved between the units (including common facilities that will be part of TMI-1 after the license transfer), under the control of TMI radioactive material handling procedures. Staging of contaminated apparatus and equipment at either unit is also a common practice. Typically, decisions on locations for staging radioactive material have considered factors associated with accessibility, load handling capability, environment, and ALARA.

These changes make it clear that AmerGen is authorized to receive and/or possess radioactive materials that are associated with maintaining TMI-2 or TMI-1. There is no intent of changing or expanding of past practices associated with the staging of radioactive materials.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

This License Amendment Request poses no significant hazards consideration as defined by 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. The proposed changes do not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor do they affect Technical Specifications that preserve safety analysis assumptions. None of the proposed changes involve a physical modification to the plant, a new mode of operation or a change to the UFSAR transient analyses. No Technical Specification Limiting Condition for Operation, Action statement or Surveillance Requirement is affected by any of the proposed changes. Examples of TMI-2 radioactive materials which are moved or staged in TMI-1, such as liquid or solid radwaste or contaminated protective clothing, provide negligible source terms for any potential release. Further, the proposed changes do not alter the design, function, or operation of any plant component. Therefore, the proposed amendment does not affect the probability of occurrence or consequences of an accident previously evaluated.
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 previously evaluated. The proposed changes do not affect assumptions contained in plant safety analyses, the physical design and/or modes of plant operation defined in the plant operating license, or Technical Specifications that preserve safety analysis assumptions. The proposed changes do not introduce a new mode of plant operation or surveillance requirement, nor involve a physical modification to the plant. The proposed changes do not alter the design, function, or operation of any plant components. Therefore, the proposed amendment does not affect the possibility of a new or different kind of accident from any accident previously evaluated.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety. None of the proposed changes involve a physical modification to the plant, a new mode of operation or a change to the UFSAR transient analyses. No Technical Specification Limiting Condition for Operation, Action statement, or Surveillance Requirement is affected. Therefore, the proposed amendment does not reduce the margin of safety.

Based upon the analysis provided herein, the proposed changes will not increase the probability or consequences of an accident previously evaluated, create the possibility of a new or different kind of accident from any accident previously evaluated, or involve a reduction in a margin of safety. Therefore, the proposed changes meet the requirements of 10 CFR 50.92(c) and involve no significant hazards consideration.

V. IMPLEMENTATION

It is requested that the amendment authorizing this change become effective upon the TMI-1 sale closure and transfer date.

Enclosure 2

TMI-1 License Revised Page

- (2) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30,40 and 70 to receive, possess and use at any time any byproduct, source and special nuclear material as reactor fuel, sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required for reactor operation;
- (3) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess at either TMI-1 or TMI-2, and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis, testing, instrument calibration, or associated with radioactive apparatus or components;
- (4) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to possess at the TMI Unit 1 or Unit 2 site, but not separate, such byproduct and special nuclear materials as may be produced by the operation of either unit.

c. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Maximum Power Level

GPU Nuclear, Inc. is authorized to operate the facility at steady state reactor core power levels not in excess of 2568 megawatts thermal.

(2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. are hereby incorporated in the license. The GPU Nuclear, Inc. shall operate the facility in accordance with the Technical Specifications.

Enclosure 3

Certificate of Service for
TMI-1 License Amendment Request No. 285

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF GPU NUCLEAR, Inc.

DOCKET NO. 50-289
LICENSE NO. DPR-50

CERTIFICATE OF SERVICE

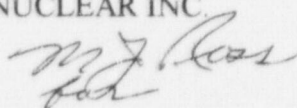
This is to certify that a copy of License Amendment Request No. 285 to the Operating License for Three Mile Island Nuclear Station Unit 1, has, on the date given below, been filed with executives of Londonderry Township, Dauphin County, Pennsylvania; Dauphin County, Pennsylvania; and the Pennsylvania Department of Environmental Resources, Bureau of Radiation Protection, by deposit in the United States mail, addressed as follows:

Mr. Darryl LeHew, Chairman
Board of Supervisors of
Londonderry Township
R.D. #1, Geyers Church Road
Middletown, PA 17057

Ms. Sally Klein, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Front & Market Streets
Harrisburg, PA 17101

Director, Bureau of Radiation Protection
PA Department of Environmental Resources
Rachel Carson State Office Building
P.O. Box 8469
Harrisburg, PA 17105-8469
ATTN: Mr. Stan T. Maingi

GPU NUCLEAR INC.

BY: 
Vice President and Director, TMI

DATE: 6/29/99