



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

February 3, 1999

Docket file

50-289

Mr. James W. Langenbach, Vice President  
and Director - TMI  
GPU Nuclear, Inc.  
P.O. Box 480  
Middletown, PA 17057

SUBJECT: TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 257 DATED  
AUGUST 29, 1996 (M96532)

Dear Mr. Langenbach:

Per the request of Mr. Jack Wetmore of your staff, we are providing you this letter documenting the basis for the NRC staff's generic approval of requests to relocate Technical Specification (TS) requirements from the TSs. Such a request is the subject of TSCR 257. In order for the staff to be able to make the requisite findings related to approving such a request, the TS requirements must be relocated to a document that is required to be controlled under the provisions of 10 CFR 50.59. Examples would be to relocate the former TS requirements to the Final Safety Analysis Report (FSAR), procedures manual or other documents (i.e., some licensees have developed a Technical Requirements Manual) that are incorporated by reference in the FSAR. In discussions with your staff regarding the above acceptance criteria, your staff has proposed to relocate the TS requirements that are the subject of TSCR 257 to the FSAR by the end of February 1999. This would be acceptable as an alternative to relocating them to procedures not described in the FSAR as currently proposed by the TSCR 257 application.

We request that you document your staff's commitment to relocate the TS requirements of TSCR 257 to the FSAR and provide the staff with a copy of the FSAR changes when approved in order for the NRC staff to verify that the relocated requirements are being properly relocated to the FSAR. As an alternative, the staff would be willing, at your request, to include a license condition in the issuing amendment to make the effectiveness of the amendment contingent upon your completion of the FSAR changes described above. We would expect that you might pursue the latter approach if you anticipated significant slippage in the FSAR change schedule, but still wanted the staff to complete its review of your request in the near future.

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J. Langenbach

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Enclosed for your information is a copy of the staff's generic Safety Evaluation Report (SER) finding relative to relocated TS requirements. If you have any questions or comments, please contact me at (301) 415-1402.

Sincerely,

/s/

Timothy G. Colburn, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

Docket No. 50-289

Enclosure: Generic SER finding

cc w/encl: See next page

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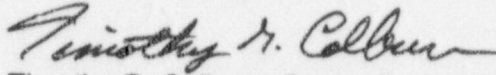
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Sincerely,



Timothy G. Colburn, Senior Project Manager  
Project Directorate I-2  
Division of Reactor Projects - I/II  
Office of Nuclear Reactor Regulation

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cc w/encl: See next page

J. Langenbach  
Three Mile Island Nuclear Station, Unit No. 1

cc:

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**EXCERPT FROM NRC STAFF GENERIC SAFETY EVALUATION REPORT  
RELATING TO RELOCATED TECHNICAL SPECIFICATION REQUIREMENTS**

The Final Policy Statement for Technical Specifications Improvements states that LCOs and associated requirements that do not satisfy or fall within any of the four specified criteria (now contained in 10 CFR 50.36) may be relocated from existing TS (an NRC-controlled document) to appropriate licensee-controlled documents. These requirements include the Limiting Conditions for Operation (LCOs), Required Action Statements, and associated surveillance requirements (SRs). In its application, the licensee can propose relocating such specifications to the Final Safety Analysis Report (FSAR), which would include the TRM (Technical Requirements Manual) or LCS (Licensee Controlled Specifications) by reference. The staff has reviewed the licensee's submittals, and finds that relocation of these requirements to the FSAR (TRM/LCS) is acceptable, in that changes to these documents will be adequately controlled by 10 CFR 50.59. These provisions will continue to be implemented by appropriate plant procedures: i.e., operating procedures, maintenance procedures, surveillance and testing procedures, work control procedures, and change control procedures.

ENCLOSURE