METROPOLITAN EDISON COMPANY JERSEY CENTRAL POWER & LIGHT COMPANY

AND

PENNSYLVANIA ELECTRIC COMPANY

THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Operating License No. DPR-50
Docket No. 50-289
Technical Specification Change Request No. 151

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

BA:

Vice President & Director, TMI-T

Sworn and Subscribed to before me this 29th day of July , 1986.

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

8608040226 860729 PDR ADOCK 05000289 PDR PDR

I. Technical Specification Change Request No. 151

GPUNC requests that the revised pages 6-3, 6-21 and the revised Figure 6-2 replace the existing pages 6-3, 6-21 and Figure 6-2 in the TMI-1 Technical Specifications.

II. Reasons for Change

This TSCR proposes the following changes for the following reasons:

- 1. Delete the position of Training Coordinator. This position was created to coordinate the development of the training programs for the Operations and Maintenance Departments. These training programs have been fully developed and implemented and the responsibility for continuation of the training programs lies with the individual department managers and the Training Department. Therefore, the position of Training Coordinator is no longer required.
- 2. Change the title of the "Radiological Controls Foreman" to "Field Operations Supervision". This change is being proposed so as to make this position title in TMI-1 consistent with the corporate organizational philosophy of GPUNC in this area. Field Operations Supervision includes the Deputy Field Operations Manager position (when filled) and the Group Radiological Controls Supervisors. The functional duties of the Field Operations Supervision will be consistent with the duties of the Radiological Controls Foreman.
- 3. Remove the reference to "Type of License (RO or SRO)" from the Shift Supervisor, Shift Foreman and Control Room Operator boxes on Figure 6.2. This change is proposed so as to remove any confusion caused by these references. In the past, the reference appearing with the Shift Foreman box on Figure 6.2 has caused confusion. The reference indicates "RO", however, Technical Specification 6.2.2 (a), Table 6.2-1, indicates that the position can be held only by an individual "...who is either SRO licensed or RO licensed and has completed the SRO training program". Technical Specification 6.2.2 (a), Table 6.2-1, and Technical Specification 6.2.2 (d) will still identify the minimum shift crew composition and types of licenses to be held by these individuals.
- 4. Change the title of the "Manager, Plant Operations TMI-1" to "Plant Operations Director, TMI-1". This title change is being proposed to reflect the addition of responsibilities to this office (i.e., Plant Chemistry). It also reflects this individual's promotion within the company.
- 5. Place the Plant Chemistry Manager, TMI-1 under the Plant Operations Director, TMI-1. The Plant Chemistry Manager, TMI-1 had been reporting to the Operations and Maintenance Director, TMI-1 while the Plant Chemistry Department was being upgraded. This upgrade has been completed and with the return to operation of TMI-1, the TMI-1 Plant Chemistry Department is being placed under the control of the Plant Operations Director, TMI-1.

III. Safety Evaluation Justifying Changes

The changes proposed in this TSCR are administrative in nature. They are intended to make the TMI-l unit staff organization more consistent with the GPUN corporate organizational philosophy. The proposed changes contained herein do not alter the functional duties of the TMI-l unit staff.

These changes, therefore, do not reduce the margin of safety provided by the Technical Specifications.

IV. No Significant Hazards Considerations

These proposed changes are similar to Example i of "Amendments Not Likely to Involve Significant Hazards Considerations", Federal Register Volume 48, No. 67 at 14870, dated April 6, 1983.

The proposed Amendment is administrative in nature, does not affect plant design or operation, and does not involve modifications to plant equipment or changes that would affect plant safety analyses. This TSCR constitutes a minor change to the organizational structure. Therefore, the proposed Amendment involves no significant hazards considerations in that it does not:

- The proposed changes do not affect plant equipment or systems and therefore will not involve a significant increase in the probability or consequences of an accident previously evaluated or
- The proposed changes do not affect plant equipment or systems and therefore will not create the possibility of a new or different kind of accident from any accident previously evaluated or
- 3. The proposed changes do not alter functional duties and therefore will not involve a significant reduction in a margin of safety.

V. Implementation

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