

Enclosure 2, Attachment 2:
Changes to Technical Specifications

1.0 DEFINITIONS

MEMBER(S) OF THE PUBLIC

- 1.16 MEMBER(s) OF THE PUBLIC means any individual except when that individual is receiving an occupational dose.

UNRESTRICTED AREA

- 1.17 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by TMI-2 Solutions, LLC for purposes of protection of Individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

SITE BOUNDARY

- 1.18 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by TMI-2 Solutions, LLC. The SITE BOUNDARY for gaseous and liquid effluents shall be as shown in the Offsite Dose Calculation Manual (ODCM).

NPDES PERMIT

- 1.19 The NPDES PERMIT is the National Pollutant Discharge Elimination System (NPDES) Permit No. PA0009920, effective January 30, 1975, Issued by the Environmental Protection Agency to Metropolitan Edison Company. This permit authorized Metropolitan Edison Company to discharge controlled wastewater from Three Mile Island (TMI) Nuclear Station into the waters of the Commonwealth of Pennsylvania.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The TMI-2 Solutions, LLC Project Director is responsible for the management of overall unit operations at Unit 2 and shall delegate in writing the succession to this responsibility during absence. |

6.2 ORGANIZATION

GPU NUCLEAR ORGANIZATION

- 6.2.1 The TMI-2 Solutions, LLC organization for unit management and technical support shall be as in Section 10.5 of the PDMS SAR. |

TMI-2 ORGANIZATION

- 6.2.2 The unit organization shall be as described in Section 10.5 of the PDMS SAR and an individual qualified in radiation protection procedures shall be on site whenever Radioactive Waste Management activities are in progress.

6.3 UNIT STAFF QUALIFICATIONS

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions unless otherwise noted in the Technical Specifications. The requirements of ANSI N18.1-1971 that pertain to operator license qualifications for unit staff shall not apply.

- 6.3.2 The management position responsible for radiological control or his deputy shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each Radiological Controls Technician in a responsible position shall meet or exceed the qualifications of ANSI N18.1-1971, paragraph 4.5.2 or 4.3.2, or be formally qualified through an NRC-approved TMI Radiation Controls training program. All Radiological Controls Technicians will be qualified through training and examination in each area or specific task related to their radiological controls functions prior to their performance of those tasks.

- 6.4 **DELETED**

ADMINISTRATIVE CONTROLS

6.12 OFFSITE DOSE CALCULATION MANUAL (ODCM)

SUBSTANTIVE CHANGES to the ODCM:

- a. Shall be documented and records of reviews performed shall be realized as required by Specification 6.9.2v. This documentation shall contain:
 1. Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s); and
 2. A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.1301, 40 CFR Part 190, 10 CFR 50.36a and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by TMI-2 Solutions, LLC Project Director.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

6.13 EXCEPTIONAL OCCURRENCES

UNUSUAL OR IMPORTANT ENVIRONMENTAL EVENTS

- 6.13.1 Any occurrence of an unusual or important event that causes or could potentially cause significant environmental impact causally related with station operation shall be recorded and reported to the NRC per Subsection 6.8.3.1. The following are examples of such events: excessive bird impaction events on cooling tower structures or meteorological towers (i.e., more than 100 in any one day); onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills near or downstream of the site.

EXCEEDING LIMITS OF RELEVANT PERMITS

- 6.13.2 Any occurrence of exceeding the limits specified in relevant permits and certificates issued by other Federal and State agencies which are reportable to the agency which issued the permit shall be reported to the NRC in accordance with the provisions of Subsection 6.8.3.2. This requirement shall apply only to topics of National Environmental Policy Act concern within the requirements of the Station NPDES permit as related to TMI-2 discharges.

6.14 DELETED