



10 CFR 50.12  
10 CFR 50, Appendix B  
10 CFR 50.59(d)(3)  
10 CFR 50.71(c)

TMI2-RA-COR-2021-0016

October 5, 2021

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Facility Operating License No. DPR 73  
NRC Docket No. 50-320

Subject: Request for Exemption from Record Retention Requirements

References:

- 1) Letter from L. W. Camper (NRC) to D. L. Pace (GPU Nuclear) "Three Mile Island Nuclear Station, Unit 2 Failure to Submit Post Shutdown Decommissioning Activities Report," dated February 13, 2013 (ML12349A291)
- 2) Letter from T. B. Smith (NRC) to J. Sauger (TMI-2 Solutions, LLC), "Three Mile Island Nuclear Station, Unit No. 2 – Issuance of Amendment No. 64 Re: Order Approving Transfer of License and Conforming License Amendment," dated December 18, 2020. (ML20352A381)

As noted in the letter from the NRC to GPU Nuclear, dated February 13, 2013 (Reference 1), the TMI-2 equivalent date to the certificate of cessation of operations was determined to be September 14, 1993. Pursuant to 10 CFR 50.12, "Specific exemptions," TMI-2 Solutions, LLC (TMI-2S) requests a permanent exemption from:

- (1) 10 CFR 50, Appendix B, Criterion XVII, which requires certain records to be retained consistent with applicable regulatory requirements for a duration established by the licensee;
- (2) 10 CFR 50.59(d)(3), which requires certain records to be maintained until "termination of an operating license issued under this part;" and
- (3) 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

Once granted, the requested exemption and application of the exemption will eliminate the requirement to maintain records that are no longer necessary due to the permanent shutdown status of TMI-2. It is further recognized that a proposed Amendment to the TMI-2 Technical Specifications, Administrative Chapter along with the conforming change to the Decommissioning QA Plan, containing the relocated Records requirements, will also need to be made. The exemption request is included as Attachment 1. The Records Retention list currently located in Technical Specification 6.9.2, as notated with asterisks for expected QA Plan changes, is included as Attachment 2.

ADD  
NRR

TMI-2 Solutions (TMI-2S) is requesting approval of this exemption request by June 1, 2022. TMI-2S will use the exemption, if granted, to eliminate the applicable records associated with structures, systems, components, and activities no longer required by the licensing basis due to the permanent shut down status of TMI-2.

This letter contains no new regulatory commitments.

If you have any questions concerning this submittal, please contact me at 860-462-9707.

Respectfully,

**Gerard van  
Noordennen**

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Gerry van Noordennen  
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Attachments:

- 1) Request for Exemption from Record Retention Requirements
- 2) Records Retention List from Technical Specifications 6.9.1 Noted with Asterisks

cc: w/Attachments

Regional Administrator - NRC Region I  
NRC Lead Inspector - Three Mile Island Nuclear Station – Unit 2  
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**TMI-2 Service List**

cc w/ attachments

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**ATTACHMENT 1**  
**REQUEST FOR EXEMPTION FROM RECORD RETENTION REQUIREMENTS**

## 1.0 SPECIFIC EXEMPTION REQUEST

Pursuant to 10 CFR 50.12, "Specific exemptions," TMI-2 Solutions (TMI-2S) requests a permanent exemption from the following record retention requirements for Three Mile Island Nuclear Station, Unit 2 (TMI-2):

- (1) 10 CFR 50, Appendix B, Criterion XVII, which requires certain records to be retained consistent with applicable regulatory requirements for a duration established by the licensee;
- (2) 10 CFR 50.59(d)(3), which requires certain records to be maintained until "termination of an operating license issued under this part;" and
- (3) 10 CFR 50.71(c), which requires certain records to be retained for the period specified by the appropriate regulation, license condition, or technical specification, or until termination of the license if not otherwise specified.

The exemption is requested to allow TMI-2 to eliminate the requirement to maintain records that are no longer necessary or applicable due to the permanently defueled condition and decommissioning status of the station. Specifically, the following records would no longer be retained:

- 1) Records associated with structures, systems, and components (SSCs), and activities that were applicable to the nuclear unit, which are no longer required by the Part 50 licensing basis (e.g., removed from the Decommissioning Final Safety Analysis Report and/or Technical Specifications by appropriate change mechanisms)
- 2) TMI-2S is not explicitly requesting an exemption from 10 CFR 50, Appendix A, Criterion 1, which requires certain records to be maintained "throughout the life of the unit," because TMI-2 is not a General Design Criteria plant. However, the list currently in the PDMS Technical Specifications to be relocated to the Decommissioning Quality Assurance Plan (DQAP) as part of the implementation of the proposed license amendment request (Reference 1) will be modified to reflect the approval of this exemption request.
- 3) TMI-2S is not requesting an exemption associated with any record keeping requirements for storage of spent fuel debris at the TMI-2 Independent Spent Fuel Storage Installation (ISFSI) under 10 CFR 50, the General License requirements of 10 CFR 72.210, or for the other requirements of 10 CFR 50 or Facility Operating License No. DPR-73 applicable to the decommissioning and dismantlement of TMI-2.

## 2.0 BACKGROUND

TMI-2S is the licensee and holder of Facility Operating License No. DPR-73 for TMI-2, which is a permanently shutdown facility preparing for decommissioning. Although permanently shutdown, this facility is still subject to applicable rules, regulations, and orders of the U. S. NRC.

Decommissioning of the TMI-2 and the nuclear reactor and essentially all associated systems, structures, and components (SSCs) in the nuclear steam supply system and balance of plant that supported the generation of power have been retired in place and are being prepared for removal. SSCs that remain operable are associated with the Reactor Building and effluent

monitoring, are needed to meet other regulatory requirements or are needed to support other site facilities (e.g., radwaste handling, HVAC, etc.). There are no SSCs classified as safety related. SSCs related to safe storage of the remaining core debris are designated as *Importance to Safety* by the current licensing basis.

TMI-2S's dismantlement plans involve evaluating SSCs with respect to the current facility safety analysis; progressively removing them from the licensing basis where necessary through appropriate change mechanisms (e.g., 10 CFR 50.59 or NRC approved Technical Specification changes, as applicable); revising the PDMS SAR if and as necessary; and, then proceeding with an orderly dismantlement.

TMI-2S intends to substantially complete decommissioning of TMI-2 and release the site by 2037, except for an area set aside for Debris Material storage. As noted in a letter from the NRC to GPU Nuclear, dated February 13, 2013 (Reference 2), the TMI-2 equivalent date to the certificate of cessation of operations was determined to be September 14, 1993. Therefore, the requirements of 10 CFR 50.36(c)(6), "Decommissioning" applies.

TMI-2S's decommissioning plans for TMI-2 are described in the Post Shutdown Decommissioning Activities Report (PSDAR) (Reference 3). As SSCs are retired (as their functions are no longer required) and they are removed from the licensing basis, the need to retain their associated records is, on a practical basis, eliminated. TMI-2S therefore requests exemptions from the records retention requirements for TMI-2 SSCs and historical activities that are no longer relevant to the licensing basis. Such exemptions would eliminate the associated, unnecessary regulatory and economic burdens of retaining records for SSCs and activities that are no longer part of the TMI-2 licensing basis.

It should be noted that due to the historical significance of TMI-2, there are additional documents not maintained by the licensee, including NUREG/KM-0001, "Three Mile Island Accident of 1979 Knowledge Management Digest". In addition, the Office of Nuclear Regulatory Research maintains a TMI-2 Knowledge Management Library on the NRC website. TMI-2S donated approximately 240 videos to the Pennsylvania Historical and Museum Commission (PHMC) for permanent preservation under the administration of the Pennsylvania State Archives, a bureau of PHMC. The Pennsylvania State Archives will manage and care for the materials according to accepted standards and make the records open and available to public inspection. Further historical records will be provided to the PHMC, as requested.

### **3.0 DISCUSSION**

In order for an exemption to be granted from the requirements of 10 CFR Part 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3) and 10 CFR 50.71(c), the licensee must show that the requirements of 10 CFR 50.12(a)(1) are met and that special circumstances, as specified in 10 CFR 50.12(a)(2), exist. As discussed below, TMI-2 satisfies these standards for the requested exemptions.

### **4.0 TECHNICAL EVALUATION**

A. TMI-2 has been in a form of SAFSTOR (referred to as Post Defueled Monitored Storage). It is being transitioned to active DECON in mid-2022. The general justification for eliminating records associated with that portion of the plant that has been retired is straightforward in

that these SSCs have been (or will be) removed from service under the NRC license, dismantled or demolished, and will not serve any TMI-2 function regulated by the NRC.

TMI-2S recognizes that some records related to the nuclear steam supply system and balance of plant will continue to be under NRC regulation primarily due to residual radioactivity. The radiological and other necessary programmatic controls (such as security, quality assurance, etc.) for the facility and the implementation of controls for the defueled condition and the decommissioning activities are and will continue to be appropriately addressed through the license and current plant documents such as the PDMS SAR and Technical Specifications. The Technical Specification records requirements are being relocated to the Decommissioning QA Plan at the point of transition noted above. Future changes made through the applicable change processes defined in the regulations (e.g., 10 CFR 50.48(f), 10 CFR 50.59, 10 CFR 50.54(a), 10 CFR 50.54(p), 10 CFR 50.54(q), etc.). Initial changes to certain of these programmatic elements and their associated records will be addressed in the proposed license amendment related with this granting of this exemption request.

**B. Spent Fuel Debris**

TMI-2S is not requesting any exemption associated with retention of spent fuel debris related records required by 10 CFR 50 and 10 CFR 72.

**5.0 JUSTIFICATION FOR EXEMPTIONS AND SPECIAL CIRCUMSTANCES**

10 CFR 50.12 states that the Commission may, upon application by any interested person or upon its own initiative, grant exemptions from the requirements of the regulations of Part 50 which are authorized by law, will not present an undue risk to the public health and safety, and are consistent with the defense and security. 10 CFR 50.12 also states that the Commission will not consider granting an exemption unless special circumstances are present. As discussed below, this exemption request satisfies the provisions of Section 50.12.

**5.1 Exemptions**

**A. The exemptions are authorized by law**

Paragraph 50.71(d)(2) allows for the granting of specific exemptions to the record retention requirements specified in the regulations. Paragraph 50.71(d)(2) states, in part:

*"...the retention period specified in the regulations in this part for such records shall apply unless the Commission, pursuant to §50.12 of this part, has granted a specific exemption from the record retention requirements specified in the regulations in this part."*

If the specific exemption requirements of 10 CFR 50.12 are satisfied, the exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, and 10 CFR 50.59(d)(3) is authorized by law. The request does not result in a violation of the Atomic Energy Act of 1954, as amended, or the Commission's regulations. Therefore, the exemptions are authorized by law.

**B. The exemptions will not present an undue risk to public health and safety**

Removal of the underlying SSCs associated with the records from the TMI-2 licensing basis has been or will be evaluated in accordance with the applicable change process defined in

the regulations (e.g., 10 CFR 50.59, or an NRC approved license amendment) to have no adverse public health and safety impact. Elimination of associated records for these SSCs will have no additional impact.

The partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B, Criterion XVII; and 10 CFR 50.59(d)(3), for the records described above is administrative in nature and will have no impact on any remaining decommissioning activities or on radiological effluents. The exemption will merely advance the schedule for no longer maintaining the specified records. Considering the historical nature of these records, these records contain information about SSCs associated with reactor operation and contain no information needed to maintain the facility in a safe condition when permanently defueled and SSCs are dismantled. The elimination of these records on an advanced timetable will have no reasonable possibility of presenting any undue risk to the public health and safety.

**C. The exemptions are consistent with the common defense and security**

The elimination of the record keeping requirements is administrative in nature and does not involve information or activities that could potentially impact the common defense and security of the United States. Upon removal of the affected SSCs from the TMI-2 licensing basis, the records have no functional purpose relative to maintaining the safe operation of the SSCs nor to maintaining conditions that would affect the ongoing health and safety of workers or the public.

Rather, the exemptions requested are administrative in nature and would merely advance the current schedule for destruction of the specified records. Therefore, the partial exemption from the record keeping requirements of 10 CFR 50.71(c); 10 CFR Part 50, Appendix B; and 10 CFR 50.59(d)(3), for the types of records described above is consistent with the common defense and security.

**5.2 Special Circumstances**

Pursuant to 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption to its regulations unless special circumstances are present. TMI-2S has determined that special circumstances are present as discussed below.

**A. Application of the regulation in the particular circumstances would not serve the underlying purpose of the rule or is not necessary to achieve the underlying purpose of the rule. (10 CFR 50.12(a)(2)(ii))**

Appendix B of 10 CFR 50, Criterion XVII, states in part:

*"Sufficient records shall be maintained to furnish evidence of activities affecting quality."*

Paragraph 50.59(d)(3) states in part:

*"The records of changes in the facility must be maintained until the termination of an operating license issued under this part..."*

Paragraph 50.71(c), states in part:

*"Records that are required by the regulations in this part or Part 52 of this chapter, by license condition, or by technical specifications must be retained for the period specified by the appropriate regulation, license condition, or technical"*



*specification. If a retention period is not otherwise specified, these records must be retained until the Commission terminates the facility license..."*

The common and underlying purpose for the records related regulations cited above is to ensure that the licensing and design basis of the facility is understood, documented, preserved and retrievable relative to establishing and maintaining the SSC's safety functions for the life of the facility. These regulations, however, do not consider the reduction in safety-related SSCs during the decommissioning process. Removal of the SSCs from the licensing basis has been or will be evaluated in accordance with the applicable change process in the regulations (e.g., 10 CFR 50.59, or NRC approved license amendment) to have no adverse public health and safety impact prior to elimination of any records. Elimination of associated records for these SSCs will have no additional impact. Retention of records associated with SSCs that are or will no longer be part of the facility licensing basis serves no safety or regulatory purpose. Ultimately, the SSCs will be physically removed from the facility. Therefore, application of these record requirements in those circumstances does not serve the underlying purpose of the regulations.

Based on the above, the application of the subject record keeping requirements to the TMI-2 records specified above is not required to achieve the underlying purpose of the rule. Thus, special circumstances are present which the NRC may consider, pursuant to 10 CFR 50.12(a)(2)(ii), to grant the requested exemption.

**B. Compliance would result in undue hardship or other costs that are significantly in excess of those contemplated when the regulation was adopted, or that are significantly in excess of those incurred by others similarly situated. (10 CFR 50.12(a)(2)(iii))**

The records retention requirements applied by the NRC to the construction and operation of nuclear power plants are intended to demonstrate, on a broad basis, that SSCs and activities are supportive of the safety analysis and the requirements of the NRC license for an operating reactor and operability of its safety functions. The records program requirements provide assurance that records will be captured, indexed, and stored in an environmentally suitable and retrievable condition resulting in a significant volume of records of many forms and a significant associated cost. The burden associated with the operations phase records requirements was understood and considered appropriate by the NRC and their reactor licensees. However, the effect of the operations phase record retention requirements that survived the life of a facility and no longer served an underlying safety purpose were not fully understood or considered. This is the current situation at the decommissioning facilities. The operating reactor records retention requirements to which TMI-2 is currently regulated are no longer necessary nor appropriate in that the SSCs and activities to which many of the records apply are no longer important to the facility, the public or worker health and safety.

**6.0 PRECEDENT**

This exemption request is consistent with similar exemption requests that have been approved recently by the NRC for other nuclear power reactor facilities beginning decommissioning. Specifically, the NRC granted similar exemptions to Three Mile Island, Unit 1 (Reference 4), Oyster Creek Nuclear Generating Station (Reference 5), Millstone Power Station, Unit 1, (Reference 6); Zion Nuclear Power Station, Units 1 and 2 (Reference 7); Vermont Yankee

Nuclear Power Plant (Reference 8); San Onofre Nuclear Generating Station, Units 1, 2, and 3 (Reference 9); Kewaunee Power Station (Reference 10); and Fort Calhoun Station (Reference 11).

## 7.0 ENVIRONMENTAL ASSESSMENT

The proposed exemptions meet the eligibility criterion for categorical exclusion set forth in 10 CFR 51.22(c)(25), because the proposed exemptions involve: (i) no significant hazards consideration; (ii) no significant change in the types or significant increase in the amounts of any effluents that may be released offsite; (iii) no significant increase in individual or cumulative public or occupational radiation exposure; (iv) no significant construction impact; (v) no significant increase in the potential for or consequences from radiological accidents; and (vi) the requirements from which the exemption is sought involve: (A) record keeping requirements. Therefore, pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the proposed exemptions.

### (i) No Significant Hazards Consideration Determination

TMI-2S has evaluated the proposed exemption to determine whether or not a significant hazards consideration is involved by focusing on the three standards set forth in 10 CFR 50.92 as discussed below:

1. Do the proposed exemptions involve a significant increase in the probability or consequences of an accident previously evaluated?

The proposed exemptions are administrative in nature. They have no effect on structures, systems, and components (SSCs) and no effect on the capability of any plant SSC to perform its design function. The proposed exemptions would not increase the likelihood of the malfunction of any plant SSC.

The probability of occurrence of previously evaluated accidents is not increased, since most previously analyzed accidents will no longer be able to occur.

Therefore, the proposed exemptions do not involve a significant increase in the probability or consequences of an accident previously evaluated.

2. Do the proposed exemptions create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed exemptions do not involve a physical alteration of the plant. No new or different type of equipment will be installed and there are no physical modifications to existing equipment associated with the proposed exemptions. Similarly, the proposed exemptions will not physically change any SSCs involved in the mitigation of any accidents. Thus, no new initiators or precursors of a new or different kind of accident are created. Furthermore, the proposed exemptions do not create the possibility of a new accident as a result of new failure modes associated with any equipment or personnel failures. No changes are being made to parameters within which the plant is normally operated, or in the setpoints which initiate protective or mitigative actions, and no new failure modes are being introduced.

Therefore, the proposed exemptions do not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Do the proposed exemptions involve a significant reduction in a margin of safety?

The proposed exemptions do not alter the design basis or any safety limits for the plant. The proposed exemptions do not impact station operation or any plant SSC that is relied upon for accident mitigation.

Therefore, the proposed exemptions do not involve a significant reduction in a margin of safety.

Based on the above, TMI-2S concludes that the proposed exemptions present no significant hazards consideration, and, accordingly, a finding of "no significant hazards consideration" is justified.

**(ii) There is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite.**

There are no expected changes in the types, characteristics, or quantities of effluents discharged to the environment associated with the proposed exemption. There are no materials or chemicals introduced into the plant that could affect the characteristics or types of effluents released offsite. In addition, the method of operation of waste processing systems will not be affected by the exemptions. The proposed exemptions will not result in changes to the design basis requirements of SSCs that function to limit or monitor the release of effluents. All the SSCs associated with limiting the release of effluents will continue to be able to perform their functions. Therefore, the proposed exemptions will result in no significant change to the types or significant increase in the amounts of any effluents that may be released offsite.

**(iii) There is no significant increase in individual or cumulative public or occupational radiation exposure.**

The proposed exemptions do not involve any physical alterations to the plant configuration or any changes to the operation of the facility that could lead to a significant increase in individual or cumulative occupational radiation exposure.

**(iv) There is no significant construction impact.**

No construction activities are associated with the proposed exemptions.

**(v) There is no significant increase in the potential for or consequences from radiological accidents.**

See the no significant hazards considerations discussion in Item (i)(1) above.

**(vi) The requirements from which exemption is sought involve: (A) record keeping requirements.**

The requirements from which the exemptions are sought involve record keeping requirements as defined in 10 CFR 50, Appendix B, Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c).

## 8.0 CONCLUSION

The information provided above gives the NRC sufficient basis for granting an exemption from the record keeping requirements of 10 CFR 50 Appendix B Criterion XVII, 10 CFR 50.59(d)(3), and 10 CFR 50.71(c) for: 1) records pertaining to SSCs or activities associated with the nuclear power unit and associated support systems that are no longer required to support the licensing basis at the TMI-2 site. This exemption does not apply to any record keeping requirements for core debris or storage of the core debris at the TMI-2 ISFSI under 10 CFR 50 or the general requirements of 10 CFR 72.

Based on the considerations discussed above, the requested exemption is authorized by law, otherwise in the public interest, and consistent with the common defense and security.

TMI-2S requests that the NRC approve this exemption request by June 1, 2022. TMI-2S will use the exemption, if granted, to eliminate the applicable records associated with SSCs and activities no longer required by the TMI-2 licensing basis.

## 9.0 REFERENCES:

1. Letter TMI2-RA-2021-002 from G.P. van Noordennen (TMI-2 Solutions), License Amendment Request "Three Mile Island, Unit 2, Decommissioning Technical Specifications," dated February 19, 2021 (ML21057A046)
2. Letter from L.W. Camper (NRC) to D.L. Pace (GPU Nuclear) "Three Mile Island Nuclear Station, Unit 2 Failure to Submit Post Shutdown Decommissioning Activities Report," dated February 13, 2013 (ML12349A291)
3. Letter TMI2-RA-2021-004 from G. P. van Noordennen, Notification of Amended "Three Mile Island Nuclear Station, Unit 2 – Post-Shutdown Decommissioning Activities Report, Revision 4," dated March 17, 2021 (ML21084A229)
4. Letter from J.C. Poole (NRC) to B. C. Hanson (Exelon, LLC) Three Mile Island Nuclear Station, Unit 1 "Partial Exemption from Certain Record Retention Requirements," dated May 19, 2020 (ML20107J648)
5. Letter from J. G. Lamb (NRC) to B. C. Hanson (TMI-2S Generation Company, LLC), "Oyster Creek Nuclear Generation Station – Exemption from Certain Record Retention Requirements," dated June 26, 2018 (ML18122A306)
6. Letter from J. B. Hickman (NRC) to D. A. Christian (Dominion Nuclear Connecticut, Inc.), "Millstone Power Station, Unit No. 1 - Partial Exemption from Record Keeping Requirements," dated January 30, 2007 (ML070110567)
7. Letter from J. B. Hickman (NRC) to J. A. Christian (ZionSolutions, LLC), "Zion Nuclear Power Station, Units 1 and 2 - Exemption from Record Keeping Requirements," dated June 23, 2011 (ML111260277)
8. Letter from J. Kim (NRC) to Vice President, Operations (Entergy Nuclear Operations, Inc.), "Vermont Yankee Nuclear Power Station - Partial Exemptions from the Requirements of 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); 10 CFR 50.71(c)," dated December 22, 2015 (ML15344A243)

9. Letter from M. Vaaler (NRC) to T. J. Palmisano (Southern California Edison Company), "San Onofre Nuclear Generating Station, Units 1, 2, and 3 - Exemption from Record Keeping Requirements," dated July 18, 2016 (ML5355A055)
10. Letter from T. H. Carter (NRC) to D. A. Heacock (Dominion Energy Kewaunee, Inc.), "Kewaunee Power Station – Exemption from Record Retention Requirements," dated May 10, 2017 (ML17069A394)
11. Letter from J. Kim (NRC) to M. J. Fisher (Omaha Public Power District), "Fort Calhoun Station, Unit No. 1 - Partial Exemptions from the Requirements of 10 CFR Part 50, Appendix B, Criterion XVII; 10 CFR 50.59(d)(3); and 10 CFR 50.71(c) (CAC NO. MF9693)," dated October 4, 2017 (ML17172A730)

**ATTACHMENT 2**

**Records Retention List from Technical Specifications 6.9.1 Noted with Asterisks**

The following records are currently required to be retained by Technical Specification 6.9.2 as long as the Licensee has an NRC license to possess the Three Mile Island facility. The pending License Amendment Request will relocate these requirements to the QA Plan. Those records indicated with an asterisk are expected to be deleted as a result of the granting of this exemption and the associated conforming amendment. Certain other records have been edited from the current TS Listing to reflect other scope reductions.

- a. \* Records and logs of unit operation covering time interval at each power level.
- b. \*Records and logs of principal maintenance activities, inspections, repair and replacement of principal items of equipment related to radioactive waste systems. (SSCs that have been abandoned)
- c. All reportable events submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by Technical Specifications.
- e. Records of changes made to the programs and procedures previously required by PDMS Technical Specification 6.8.1 or relocated to the DQAP.
- f. \* Radiation Safety Program Reports and Quarterly Recovery Progress Reports on the March 28, 1979 incident.
- g. Records of radioactive shipments.
- h. Records and logs of radioactive waste systems operations.
- i. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Decommissioning Safety Analysis Report.
- j. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- k. \* Records of transient or operational cycles for those unit components designed for a limited number of transients or cycles.
- l. \* Records of reactor tests and experiments.
- m. Records of training and qualification for current members of the facility staff.
- n. \* Records of in-service inspections previously required by the Technical Specifications.
- o. Records of Quality Assurance activities required by the Decommissioning Quality Assurance Plans.
- p. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- q. Records of meetings of the Project Operating Review Committee (PORC) and reports of evaluations prepared by the Decommissioning Nuclear Safety Review Board (DNSRB).
- r. \* Records of the incident which occurred on March 28, 1979.
- s. Records of facility radiation and contamination surveys.

- t. Records of radiation exposure received by all individuals for whom monitoring was required.
- u. Records of gaseous and liquid radioactive material released to the environs.
- v. Records of reviews performed for changes made to the Offsite Dose Calculation Manual (ODCM).