

ENCLOSURE 1

TMI-1 Technical Specification Change Request No. 282 Safety Evaluation

No Significant Hazards Consideration and

Proposed Technical Specification Revised Pages

I. Technical Specification Change Request No. 282

GPU Nuclear requests that the following changed replacement pages be inserted into the existing Technical Specifications:

Revised Technical Specification Pages: 3-35, 4-60, 6-1, 6-1a, 6-2, 6-10, 6-20

These pages are attached to this enclosure. 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 and organizational titles contained in the attached proposed revised Technical Specification pages.

II. Reason for Change

The purpose of this Technical Specification Change Request is to revise the TMI-1 Technical Specifications to reflect changes in the current titles of several positions within the plant organization. The proposed changes are considered to be administrative in nature since this activity consists of replacing the current title of "Director, Operations and Maintenance, TMI" with "Plant Manager" due to an organizational realignment of the Operations and Maintenance functions under AmerGen, and other title changes. The revised position titles maintain the existing Technical Specification title position qualification requirements and the current level of commitment to ANSI/ANS 3.1-1978 as identified in the TMI-1 Operational Quality Assurance (OQA) Plan.

III. Safety Evaluation Justifying Change

The proposed Technical Specification plant organization title changes involve the following specific changes:

- a) "Director, Operations and Maintenance, TMI" to "Plant Manager"
- b) "Shift Supervisor" to "Shift Manager"
- c) "Shift Foreman" to "Control Room Supervisor"
- d) "Radiological Controls/Safety Director, TMI" to "Director-Radiological Health and Safety"
- e) "Industrial Safety and Health Manager" to "management position responsible for occupational safety"

Each specific change is described below.

"Director, Operations and Maintenance, TMI" to "Plant Manager"

This proposed change reflects the addition of the "Plant Manager" position to the plant organization. Upon approval of the proposed change, the TMI Unit 1 organization will be realigned to replace the current "Director, Operations and Maintenance, TMI"

position with the positions of "Plant Manager" and the "Director- Work Management", both of which report directly to the TMI Unit 1 Vice President. The "Plant Manager" position is responsible and accountable for operating the plant safely, reliably and efficiently in compliance with all applicable Technical Specifications, quality assurance requirements, procedures and federal, state, and local requirements. These functions and responsibilities related to plant operations are consistent with the operational functions and responsibilities currently described in the TMI-1 UFSAR for the "Director, Operations and Maintenance, TMI". The "Plant Manager" position is required to meet or exceed the minimum qualifications of ANSI/ANS 3.1-1978, "Standard for Selection and Training of Nuclear Power Plant Personnel", in accordance with the OQA Plan commitment for TMI-1. Since the "Plant Manager" qualifications and operational functions, responsibilities and accountabilities are essentially equivalent to the "Director, Operations and Maintenance, TMI" position, there is no reduction in the qualifications, authority and accountability associated with the affected Technical Specification responsibilities. Therefore, this change is considered administrative.

Although the proposed Technical Specification changes only include the "Plant Manager" position due to the plant operations accountability of the affected Technical Specification sections, the "Director- Work Management" position is also required to meet the applicable qualification requirements specified in ANSI/ANS 3.1-1978, and is charged with the responsibilities and accountabilities applicable to plant maintenance as described in the TMI-1 UFSAR for the current "Director, Operations and Maintenance, TMI" position.

"Shift Supervisor" to "Shift Manager"

This proposed change reflects an organizational title change only. There is no substantive change to the functions, responsibility or authority of the position as currently described for TMI-1 in the UFSAR. Additionally, this proposed change does not alter the minimum shift crew composition as specified in TMI-1 Technical Specification Table 6.2-1. Therefore, the proposed change is considered to be administrative.

"Shift Foreman" to "Control Room Supervisor"

This proposed change reflects an organizational title change only. There is no substantive change to the functions, responsibility or authority of the position as currently described for TMI-1 in the UFSAR. Additionally, this proposed change does not alter the minimum shift crew composition as specified in TMI-1 Technical Specification Table 6.2-1. Therefore, the proposed change is considered to be administrative.

“Radiological Controls/Safety Director, TMI” to “Director-Radiological Health and Safety”

This proposed change reflects an organizational title change only. There is no substantive change to the functions or responsibility of the position as currently described for TMI-1 in the UFSAR. The “Director-Radiological Health and Safety” position remains responsible for implementation of the Radiation Protection Plan and performance of ALARA reviews. Therefore, the proposed change is considered to be administrative.

“Industrial Safety & Health Manager” to “Management Position Responsible for Occupational Safety”

This proposed change reflects a generic organizational title reference only. The “Industrial Safety & Health Manager” title is being replaced with the title of “Manager Occupational Safety” and there is no substantive change to the functions, responsibility or authority of the position as currently described for TMI-1 in the UFSAR. The affected Technical Specification review and approval function for snubber accessibility is maintained at the manager level, and the proposed generic position reference will preclude the possible future need for a Technical Specification change for title changes at this organizational level. Therefore, the proposed change is considered to be administrative.

The proposed changes are administrative in nature to identify revised organizational titles and positions. These title changes reflect plant organization positions which maintain existing qualification requirements, functions, responsibilities and authorities related to the affected Technical Specification requirement. The OQA Plan commitment to the requirements of ANSI/ANS 3.1-1978 for the affected functions is maintained. The changes are considered administrative in nature since there is no affect on plant operation or plant systems, structure or components. No physical changes to the plant are being made. Therefore, this change has no adverse impact on nuclear safety or safe plant operations.

IV. No Significant Hazards Consideration

GPU Nuclear has determined that this Technical Specification Change 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 are administrative in nature and 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. These proposed changes do not reduce the level of qualification, authority or accountability associated with the affected Technical Specification responsibilities. 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 are administrative in nature and 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. The proposed changes are administrative in nature. There is no reduction in the organization position qualifications, authority and accountability associated with the affected Technical Specification responsibilities. 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.

V. Implementation

GPU Nuclear requests that the amendment authorizing this change become effective as of the date of issuance, but not earlier than the TMI-1 sale closure and transfer date, and implemented within 30 days.

Proposed Technical Specification Revised Pages

3.5.2.5 Control Rod Positions

- a. Operating rod group overlap shall not exceed 25 percent \pm 5 percent, between two sequential groups except for physics tests.
- b. Position limits are specified for regulating control rods. Except for physics tests or exercising control rods, the regulating control rod insertion/withdrawal limits are specified in the CORE OPERATING LIMITS REPORT. If any of these control rod position limits are exceeded, corrective measures shall be taken immediately to achieve an acceptable control rod position. Acceptable control rod positions shall be attained within four hours.
- c. Safety rod limits are given in 3.1.3.5.

3.5.2.6 The control rod drive patch panels shall be locked at all times with limited access to be authorized by the Plant Manager.

3.5.2.7 Axial Power Imbalance:

- a. Except for physics tests the axial power imbalance, as determined using the full incore system (FIS), shall not exceed the envelope defined in the CORE OPERATING LIMITS REPORT.

The FIS is operable for monitoring axial power imbalance provided the number of valid self powered neutron detector (SPND) signals in any one quadrant is not less than the limit in the CORE OPERATING LIMITS REPORT.

- b. When the full incore detector system is not OPERABLE and except for physics tests axial power imbalance, as determined using the power range channels (out of core detector system)(OCD), shall not exceed the envelope defined in the CORE OPERATING LIMITS REPORT.
- c. When neither detector system above is OPERABLE and, except for physics tests axial power imbalance, as determined using the minimum incore system (MIS), shall not exceed the envelope defined in the CORE OPERATING LIMITS REPORT.
- d. Except for physics tests if axial power imbalance exceeds the envelope, corrective measures (reduction of imbalance by APSR movements and/or reduction in reactor power) shall be taken to maintain operation within the envelope.

4.17 SHOCK SUPPRESSORS (SNUBBERS)

SURVEILLANCE REQUIREMENTS

4.17.1 Each snubber shall be demonstrated OPERABLE by performance of the following inspection program.

a. Snubber Types

As used in this specification, type of snubber shall mean snubbers of the same design and manufacturer, irrespective of capacity.

b. Visual Inspections

Snubbers are categorized as inaccessible or accessible during reactor operation and may be treated independently. The Director-Radiological Health and Safety, will ensure that a review is performed for ALARA considerations on all snubbers which are located in radiation areas for the determination of their accessibility. This review shall be in accordance with the recommendations of Regulatory Guides 8.8 and 8.10. The determination shall be based upon the known or projected radiation levels at each snubber location which would render the area inaccessible during reactor operation and based upon the expected time to perform the visual inspection. Snubbers may also be determined to be inaccessible because of their physical location due to an existing industrial safety hazard at the specific snubber location. This determination shall be reviewed and approved by the management position responsible for occupational safety.

Snubbers accessible during reactor operation shall be inspected in accordance with the schedule stated below. Snubbers scheduled for inspection that are inaccessible during reactor operation because of physical location or radiation levels shall be inspected during the next reactor shutdown greater than 48 hours where access is restored* unless previously inspected in accordance with the schedule stated below.

Visual inspections shall include all safety related snubbers and shall be performed in accordance with the following schedule:

<u>No. Inoperable Snubbers of Each Type per Inspection Period</u>	<u>Subsequent Visual Inspection Period**#</u>
0	24 months ± 25%
1	16 months ± 25%
2	6 months ± 25%
3, 4	124 days ± 25%
5, 6, 7	62 days ± 25%
8 or more	31 days ± 25%

* Snubbers may continue to be inaccessible during reactor shutdown greater than 48 hours (e.g. if purging of the reactor building is not permitted).

** The inspection interval for each type of snubber shall not be lengthened more than one step at a time unless a generic problem has been identified and corrected; in that event the inspection interval may be lengthened one step the first time and two steps thereafter if no inoperable snubbers of that type are found.

The provisions of Table 1.2 are not applicable.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Vice President - TMI shall be responsible for TMI-1 and TMI-2 operations and may, at any time, delegate his responsibilities in writing to the Plant Manager. He shall delegate the succession of his responsibilities in writing during his absence.

6.1.2 The Shift Manager (or during his absence from the Control Room, a designated individual), shall be responsible for the Control Room command function. A management directive to this effect signed by the President – GPU Nuclear, Inc. shall be reissued to all unit personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 CORPORATE

6.2.1.1 An onsite and offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.

6.2.1.2 Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. These relationships shall be documented and updated as appropriate, in the form of organizational charts. These organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.

6.2.1.3 The President-GPU Nuclear, Inc. shall have corporate responsibility for overall plant nuclear safety and shall take measures to ensure acceptable performance of the staff in operating, maintaining, and providing technical support so that continued nuclear safety is assured.

6.2.2 UNIT STAFF

6.2.2.1 The Vice President-TMI shall be responsible for overall site safe operation and shall have control over those on site activities necessary for safe operation and maintenance of the site.

6.2.2.2 The unit staff organization shall meet the following:

- a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
- b. At least one licensed Reactor Operator shall be present in the control room when fuel is in the reactor.

- c. At least two licensed Reactor Operators shall be present in the control room during reactor startup, scheduled reactor shutdown and during recovery from reactor trips.
- d. The Shift Manager or Control Room Supervisor # shall be in the control room at all times other than cold shutdown conditions ($T_{ave} < 200^{\circ}\text{F}$) when he shall be onsite.
- e. An individual ## qualified pursuant to 6.3.2 in radiation protection procedures shall be on site when fuel is in the reactor.
- f. All REFUELING OPERATIONS shall be observed and directly supervised by either a licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation.
- g. A Site Fire Brigade ## of at least 5 members shall be maintained onsite at all times. The Site Fire Brigade shall not include members of the minimum shift crew necessary for safe shutdown of the unit and any personnel required for other essential functions during a fire emergency.
- h. The Shift Technical Advisor shall serve in an advisory capacity to the Shift Manager on matters pertaining to the engineering aspects assuring safe operation of the unit.

6.2.2.3 Individuals who train the operating staff and those who carry out the health physics and quality assurance function shall have sufficient organizational freedom to be independent from operating pressures, however they may report to the appropriate manager on site.

If not SRO licensed, he shall have completed the SRO Training program.

The individual of item 6.2.2.2e and the Fire Brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence provided immediate action is taken to fill the required positions.

TABLE 6.2-1

MINIMUM SHIFT CREW COMPOSITION⁽ⁱⁱⁱ⁾

LICENSE CATEGORY QUALIFICATIONS	$T_{ave} > 200^{\circ}$	$T_{ave} \leq 200^{\circ}$
SRO ^(iv)	2	1 ⁽ⁱ⁾
RO ^(iv)	2	1
Non-Licensed Auxiliary Operator	2	1
Shift Technical Advisor	1 ⁽ⁱⁱ⁾	None Required

- (i) Does not include the Licensed Senior Reactor Operator or Senior Reactor Operator Limited to Fuel Handling, supervising (a) irradiated fuel handling and transfer activities onsite, and (b) all unirradiated fuel handling and transfer activities to and from the Reactor Vessel.
- (ii) May be on a different shift rotation than licensed personnel.
- (iii) Except for the Shift Manager, shift crew composition may be one less than the minimum requirements for a period of time not to exceed 2 hours in order to accommodate unexpected absence of on-duty shift crew members provided immediate action is taken to restore the shift crew composition to within the minimum requirements of Table 6.2-1. This provision does not permit any shift crew position to be unmanned upon shift change due to an incoming shift crewman being late or absent.
- (iv) Pursuant to the requirements of 10 CFR 50.54(m).

6.6 REPORTABLE EVENT ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Nuclear Regulatory Commission shall be notified and a report submitted pursuant to the requirements of Section 50.73 to 10 CFR 50, and
- b. Each REPORTABLE EVENT shall undergo an independent safety review pursuant to Specification 6.5.2.5.d.

6.7 SAFETY LIMIT VIOLATION

6.7.1 The following actions shall be taken in the event a safety limit is violated:

- a. The reactor shall be shutdown and operation shall not be resumed until authorized by the Nuclear Regulatory Commission.
- b. An immediate report shall be made to the Plant Manager, and Vice President TMI, and the event shall be reported to NRC in accordance with 10 CFR 50.72.
- c. A complete analysis of the circumstances leading up to and resulting from the occurrence shall be prepared by the unit staff. This report shall include analysis of the effects of the occurrence and recommendations concerning operation of the unit and prevention of recurrence. This report shall be submitted to the Plant Manager and the Vice President, TMI. The safety limit violation report shall be submitted to NRC in accordance with 10 CFR 50.73.

6.10 RECORD RETENTION

6.10.1 The following records shall be retained for at least five years:

- a. Records of normal station operation including power levels and periods of operation at each power level.
- b. Records of principal maintenance activities, including inspection, repairs, substitution, or replacement of principal items of equipment related to nuclear safety.
- c. All REPORTABLE EVENTS.
- d. Records of periodic checks, tests and calibrations.
- e. Records of reactor physics tests and other special tests related to nuclear safety.
- f. Changes to procedures required by Specification 6.8.1.
- g. Deleted
- h. Test results, in units of microcuries, for leak tests performed on licensed sealed sources.
- i. Results of annual physical inventory verifying accountability of licensed sources on record.
- j. Control Room Log Book.
- k. Control Room Supervisor Log Book.

ENCLOSURE 2

Certificate of Service for TMI-1

Technical Specification Change Request No. 282

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 Technical Specification Change Request No. 282 to Appendix A of 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:

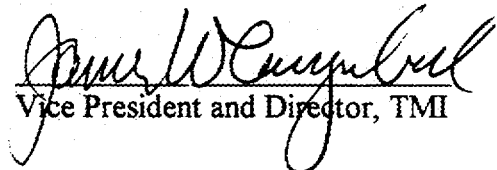
Mr. Darryl LeHew, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

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 Dept. of Environmental Resources
Rachael Carson State Office Building
P.O. Box 8469
Harrisburg, PA 17105-8469
ATTN: Mr. Stan Maingi

GPU NUCLEAR INC.

BY:


Vice President and Director, TMI

DATE:

6/11/99