

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. 14

This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix B 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 B are also included.

METROPOLITAN EDISON COMPANY

ATTEST:

By RC Arnold
Vice President-Generation

Sworn and subscribed to me this 13th day of June, 1975

Richard I. Ruth
Notary Public

RICHARD I. RUTH
Notary Public, Philadelphia, Pa., Beris Co.
My Commission Expires September 22, 1978

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Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289

Licensee requests that certain changes, as hereinafter described, be made in Appendix B of the TMI-1 Technical Specifications. A copy of the affected pages with these changes indicated are attached.

- TECHNICAL SPECIFICATION CHANGE REQUEST NO. 14a -

Change Request

Page 40, 4.1.1.E, Method of Analysis. Insert the word "Zooplankton" in the third line before "mortality."

Reason for Change Request

It is the Licensee's belief that the intent of Environmental Technical Specification 4.1.1 C., "Method of Analysis," is to require zooplankton, but not phytoplankton, mortality studies. The reason for the Change Request, therefore, is to better state what is believed to be the intended meaning of the subject specification.

Environmental Analysis Justifying Proposed Change

It should be noted that there presently exists no approved method of analysis for determining phytoplankton mortality. Better stating what is believed to be the intended meaning of the specification, therefore, would have no adverse environmental impact in that no matter what the actual intent of the specification, it would not be possible to perform the subject studies.

Cost-Benefit Analysis Justifying Proposed Change

There is no cost associated with this change request in that it serves to only more clearly state what is believed to be the intended meaning of the subject specification. The benefit that would be derived is that any ambiguity that may exist within the Commission, regarding interpretation of the subject specification, would be eliminated, and thus serve to avoid potential questions regarding compliance.

- TECHNICAL SPECIFICATION CHANGE REQUEST NO. 14b -

Change Request

Page 63, 5.6.1, second paragraph: change "... (25% above background for external dose, or twice background for radionuclide content) ..." to "which were reported in accordance with 5.6.2.b.3."

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Reason for Change Request

It is the Licensee's position that deleting the requirement to make the subject 25% above background and twice background presentations would not degrade the effectiveness of the environmental monitoring/control program, yet would serve to cut costs. The reason for the proposed change, therefore, is to eliminate the unwarranted costs of having to make the subject presentations.

Environmental Analysis Justifying Proposed Change No. 28, (Rev. 1)

It is believed that deleting the requirement to make the presentations in question would have no adverse effect on the environment in that the environmental monitoring/control program would not be degraded. Reasons for having made this determination are as follows:

- a. plant operations which would result in exceeding either the 25% above background or twice background levels would most likely result in exceeding either 4 times the control station value, or both 4 times and 10 times the control station value, which levels require reporting in accordance with sections 5.6.2.b.3) and 4), and
- b. for those situations in which either the 25% above background or twice background levels are exceeded, but the 4 times level is not exceeded, it is believed that these levels are usually the result of variations in background levels.

Further, it should be noted that recent draft regulatory guidance has served to confirm the lack of relevance of the presentations in question in that they are not specified requirements, that such requirements have not been imposed on more recent licensees, that these same types of presentations will, as a result of this change, be made at the ten times the control station value in conjunction with specification 5.6.2.b.3, and that non-routine reports will continue to be made at 4 times and 10 times the control station value in accordance with sections 5.6.2.b.3) and 4).

Cost-Benefit Analysis Supporting Proposed Change No. 28 (Rev. 1)

Deletion of the requirement to make the two subject presentations would not cause detrimental effects to the environment, yet would result in a cost savings of at least \$1,000 per year (this cost savings would be derived primarily from a reduction in the total number of man-hours required to prepare reports).

C. Entrainment of Plankton	Semi-monthly at 4-hour intervals over a 24-hour period during April thru October	Intake and Discharge	Pumping	Counting and determination of extent of Zooplankton mortality identification to the lowest feasible taxon. A continuing record will be maintained to allow comparison of variation of numbers with time.
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A continuing aquatic population surveillance program (D and E) shall be conducted during the first three years of operation. The results will be reviewed at the end of the first 30 months and the program terminated at the end of three years unless the results of the review indicate the need for additional data.

D. Fish	Every 7 weeks, March through October	At locations indicated on Figure 1	Trap nets and Shoreline Seining	Counting, identification to the lowest feasible taxon, weighing, determination of reproduction status and condition. A continuing record will be maintained to allow comparison of variation of numbers with time. Replicate samples will be taken both inside and outside the thermal plume.
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E. Macro-Invertebrates	Semi-monthly April thru October	At location indicated on Figure 1.	Notes and dredges	Counting and identification to the lowest feasible taxon. A continuing record will be maintained to allow comparison of variation of numbers with time. Replicate samples will be taken both inside
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- j. Liquid and gaseous release operating procedure
- k. Reactor trip emergency procedure.
- l. Loss of reactor coolant or reactor coolant pressure emergency procedure.
- m. Post accident H₂ purge procedure.

5.5.3 All procedures described above and all changes thereto will be reviewed periodically under the cognizance of the Manager-Generation Engineering; however, temporary changes to these procedures which do not change the intent of the original procedure may be made providing such changes are approved by two members of the Plant Management Staff. Such procedure change approval will be documented.

5.6 Plant Reporting Requirements

5.6.1 Routine Reports

A report on environmental surveillance programs for the previous six months' operations will be submitted as part of the Semiannual Operating Report within 60 days after January 1 and July 1 of each year. The first such period will begin with the date of initial criticality. The report will be a summary of results of the environmental activities for the six month period and an assessment of the observed impacts of the plant operation on the environment.

Individual environmental samples which show significantly higher than normal levels which were reported in accordance with 5.6.2.b will be noted in the report. Results of all radiological environmental samples taken shall be summarized for inclusion in the semiannual report. In the event that some results are not available within the 60 day period, the report will be submitted noting and explaining the reasons for the missing data. The missing data shall be submitted as soon as possible in a supplementary report.

The report will include a summary of the quantities of radioactive effluents released from the plant as outlined in USAEC Regulatory Guide 1.21 with data summarized on a monthly basis following the format of Appendix A thereof. If statistically significant variations of offsite environmental radionuclide concentrations with time are observed, a comparison of these results with effluent releases shall be provided.

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UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION



IN THE MATTER OF

DOCKET NO. 50-289
OPERATING LICENSE NO. DPR-50

METROPOLITAN EDISON COMPANY

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Mr. Weldon B. Arehart, Chairman
Board of Supervisors of
Londonderry Township
R.D. #1, Geyers Church Road
Middletown, Pennsylvania 17057

Mr. Charles P. Hoy, Chairman
Board of County Commissioners of
Dauphin County
Dauphin County Courthouse
Harrisburg, Pennsylvania 17120

METROPOLITAN EDISON COMPANY

By RC Arnold
Vice President-Generation

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Vice President-Generation

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