

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. 231

COMMONWEALTH OF PENNSYLVANIA)
COUNTY OF DAUPHIN) SS:
)

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

BY: *J. Broughton*
Vice President and Director, TMI-1

Signed and sworn before me this
24th day of August, 1993.

Melody Kim Kulp
Notary Public

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Notarial Seal
Melody Kim Kulp, Notary Public
Londonderry Twp., Dauphin County
My Commission Expires Aug. 21, 1997
Member, Pennsylvania Association of Notaries

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

IN THE MATTER OF
GPU NUCLEAR CORPORATION

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

CERTIFICATE OF SERVICE

This is to certify that a copy of Technical Specification Change Request No. 231 to Appendix A of the Operating License for Three Mile Island Nuclear Station Unit 1 has been filed on the date given below with the 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:

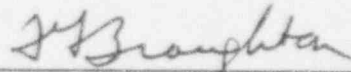
Mr. Daryl LeHew, Chairman
Board of Supervisors of
Londonderry Township
R. D. #1, Geyers Church Road
Middletown, PA 17057

Mr. Russell L. Sheaffer, Chairman
Board of County Commissioners
of Dauphin County
Dauphin County Courthouse
Harrisburg, PA 17120

PA. Dept. of Environmental Resources
Bureau of Radiation Protection
P.O. Box 2063
Harrisburg, PA 17120
Attn: Richard Janati

GPU NUCLEAR CORPORATION

BY:



Vice President and Director, TMI-1

DATE: August 24, 1993

I. TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 231

GPU Nuclear requests that the following revision be made to the TMI-1 Technical Specifications (TS):

Replace the existing pages 4-1, 4-2, and 4-2a with the attached revised pages 4-1, 4-2 and 4-2a.

Add new pages 4-1a, and 4-2b.

II. Reason for the Change

This change to the Technical Specifications (TS) incorporates clarifying portions of the revised Standard Technical Specification (STS)¹ Sections SR 3.0.1, SR 3.0.3 and the STS Bases for SR 3.0.3.

NRC Generic Letter (GL) 87-09² proposed model Technical Specifications (Tech Specs) to provide certain improvements including establishment of a delay period in the applicability of the action requirements of up to 24 hours to complete a missed surveillance. GPU Nuclear did not apply for this improvement. TMI-1 has custom Tech Specs and they were interpreted such that a missed surveillance did not constitute a condition prohibited by the Tech Specs.

Inspection Report 92-20, dated January 6, 1993 contained a Notice of Violation (NOV) for failure to report a missed surveillance as a condition prohibited by the Tech Specs. GPU Nuclear contested the violation and provided the basis to support our interpretation of TMI-1 Technical Specifications in a letter to the NRC dated January 29, 1993.

The GPU Nuclear position was rejected by the NRC in a letter dated May 11, 1993 which prevailed upon GPU Nuclear to accept the violation. The letter stated that GPU Nuclear had not incorporated the STS provision for a 24 hour delay into the TMI-1 Tech Specs. If TMI-1 had done so, there would not have been a violation of the Tech Specs and a Licensee Event Report (LER) would not have been required. The purpose of this change is to adopt clarifying portions of STS, Sections SR 3.0.1, SR 3.0.3, and the STS Bases for SR 3.0.3 to avoid future misunderstandings concerning violations and LER requirements by establishing a delay period of up to 24 hours in the applicability of the action requirements in the event that a surveillance is missed.

¹ NUREG-1430, Standard Technical Specifications for Babcock and Wilcox Plants, September 1992.

² Generic Letter (GL) 87-09, "Sections 3.0 and 4.0 of the Standard Technical Specifications (STS) on the Applicability of Limiting Conditions for Operation and Surveillance Requirements," dated June 4, 1987.

III. Safety Evaluation Justifying the Proposed T.S. Change

GL 87-09 proposed model Tech Specs that allow a delay time of 24 hours to complete a missed surveillance. The GL contained rationale for allowance of additional time to perform a surveillance when it is discovered that a surveillance interval has been inadvertently exceeded and the rationale for the amount of time that should be allowed for completion of the surveillance before operability is called into question solely by the absence of a completed surveillance. It was recognized, in the case of a missed surveillance, that the primary question is one of operability; i.e., operability has not been verified by the performance of a surveillance requirement. The GL stated that improvements were needed to avoid unnecessary shutdowns caused by inadvertently exceeding a surveillance interval and proposed that a time limit of up to 24 hours be established to delay the required actions to permit the performance of a missed surveillance based on consideration of the plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the surveillance. The staff concluded in GL 87-09 that 24 hours is an acceptable time limit for completing a missed surveillance.

The newly revised STS (NUREG-1430) incorporated the improvements proposed in GL 87-09 and provided, in Surveillance Requirement (SR) 3.0.1 and 3.0.3, a delay period to allow additional time for the performance of a missed surveillance. NUREG-1430 introduced additional clarification and provided bases for these sections.

This change adopts text and bases from STS Sections 3.0.1 and 3.0.3. New Sections 4.0.1 and 4.0.2 incorporate portions of STS SR 3.0.1 and SR 3.0.3. The STS Bases for SR 4.0.1 has also been incorporated in its entirety. Minor differences from the STS wording were necessary for compatibility with the TMI-1 Tech Specs.

IV. No Significant Hazards Consideration

Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant operations.

GPUN has determined that this Technical Specification Change Request poses no significant hazards consideration as defined by 10CFR 50.92. Operation of the facility in accordance with the proposed amendment will have no adverse effect on nuclear safety or safe plant operation as evaluated below:

1. Operation of the facility in accordance with the proposed amendment would not involve a significant increase in the probability of occurrence or consequence of an accident previously evaluated. The proposed changes only affect

administrative requirements regarding the performance of surveillances. This change will allow a 24 hour delay period for the performance of a surveillance when it is discovered that the surveillance has not been performed within the required frequency. There is minimal safety significance associated with a delay of 24 hours in completing the required surveillance, particularly due to the fact that the most probable result of any particular surveillance performed is the successful verification of conformance with the requirements.

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 only affect administrative requirements regarding the performance of surveillances to allow a 24 hour delay period when it is discovered that a surveillance has been missed. No changes to plant equipment or operation are affected.
3. Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in the margin of safety since the change contained in the proposed amendment does not change any existing safety margins.

IMPLEMENTATION

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