

Operating License No. DPR-50
Docket No. 50-289
Facility Operating License Amendment Request No. 246

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THREE MILE ISLAND NUCLEAR STATION - UNIT 1
OPERATING LICENSE NO. DPR-50
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I. FACILITY OPERATING LICENSE AMENDMENT REQUEST NO. 246

GPUN requests that the License condition 2.c.9 of the existing TMI-1 Operating License No. DPR-50, be amended as follows.

Proposed License Amendment:

2.C.9 Long Range Planning Program

The revised "Plan for the Long Range Planning Program for the Three Mile Island Nuclear Station - Unit 1" (the Plan) submitted by GPUN letter C311-94-2124, dated: September 26, 1994 is approved.

- a. The Plan shall be followed by the Licensee from and after the date of license amendment issuance.
- b. The Category A schedule shall not be changed without prior approval from the NRC. Categories B and C schedules may be changed without prior approval by NRC.

II. DISCUSSION:

This amendment request submits a revised "Plan for the Long Range Planning Program (LRPP) for Three Mile Island Nuclear Station - Unit 1" (aka, the Plan) for review and approval. Plan changes are necessary as a result of changing evaluation criteria and an evolved and refined project assessment methodology; and, to amend the reporting frequency for updates of the projects listing from semi-annual to annual. An annual reporting period is justified on the basis that semi-annual reporting does not provide substantially more information to the NRC than an annual report. Revisions of the projects listing occurs infrequently, with most additions generated six months to one year prior to refueling outages as well as at the completion of such outages due to work scope completions. It should also be noted that TMI-1 is currently on a two year refueling cycle.

The primary objectives of the Plan for LRPP are unchanged, i.e., it serves as a process to optimize the allocation of GPUN and NRC resources in assuring continued safety, reliability and economic plant operation. The Plan has been revised to eliminate the ranking of projects or tasks with a numerical score prior to prioritization by category. This change does not impact overall prioritization and scheduling of projects or tasks, as the enhanced evaluation criteria are categorized to provide appropriate significance for planning and assessment of priority.

III. SAFETY EVALUATION

The justification for this change is based upon the suggested guidelines in Generic Letter 85-07 issued by NRC on May 2, 1985 regarding implementation of the Integrated Schedule concept. The LRPP by itself has no safety function, albeit the projects listed in the Long Range Plan may affect safety systems, structures, or components at TMI-1. Rather, the LRPP serves to establish a basis and methodology for planning and scheduling the implementation of major plant modifications and NRC mandated changes. Any changes in plant configuration or operation resulting from projects in the Long Range Plan are required to be evaluated separately in a safety review process that meets the requirements of 10 CFR 50.59 and/or configuration control procedures. Further, the proposed amendment while revising the License Condition 2.C.9 wording does not in and of itself result in a change to any Technical Specification; and, therefore the margins of safety as stated in Technical Specification Bases are not impacted or changed by the proposed license amendment.

IV. NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPUN has determined, based upon the above discussion, that the proposed amendment of the Facility Operating License for TMI-1 involves no significant hazards consideration as defined in 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 consequences of an accident previously evaluated. The proposed revision to the Facility Operating License does not affect the safety analysis and does not involve any physical changes to the plant, nor any changes in the format or restraints on plant operations, and only contemplates a change to the Plan for the Long Range Planning Program currently approved by the NRC in license condition 2.C.9. Therefore, this change will not increase the probability of previously analyzed accidents because it involves no direct plant modification or change in operations, and hence, it is also unrelated to the possibility of increasing the consequences of previously analyzed accidents.
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 revision to the Facility Operating License does not affect the safety analysis and does not involve any physical changes to the plant, nor any changes in the format or restraints on plant operations, and only contemplates a change to the Plan for the Long Range Planning Program currently approved by the NRC in license condition 2.C.9. Therefore, this change has no effect on the possibility of creating a new or different kind of accident from any 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 revision to the Facility Operating License does not involve any physical changes to the plant, nor any changes in the format or restraints on plant operations, and only contemplates a change to the Plan for the Long Range Planning Program currently approved by the NPC in license condition 2.C.9. Therefore, the overall margin of safety for the plant is maintained.

The Commission has provided guidelines pertaining to the application of the three standards by listing specific examples in 48 FR 14870. The proposed amendment is considered to be in the same category as example (i) of amendments that are considered not likely to involve significant hazards considerations in that the proposed change is purely an administrative change to allow for revision of the LRPP and does not involve any physical changes to the plant or restraints on plant operations. Thus, operation of the facility in accordance with the proposed amendment involves no significant hazards considerations.

V. IMPLEMENTATION

It is requested that this license amendment become effective upon issuance.

ENCLOSURE 2