

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. 194

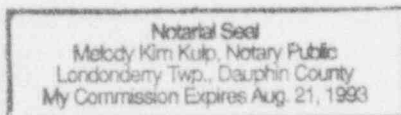
This Technical Specification Change Request is submitted in support of Licensee's request to change Appendix A to Operating License No. DPR-50 for Three Mile Island Nuclear Station, Unit 1. As a part of this request, proposed replacement pages for Appendix A are also included.

GPU NUCLEAR CORPORATION

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

Sworn and subscribed to before me
this 19th day of May, 1992.

Melody Kim Kulp
Notary Public



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. 194 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. Jay H. Kopp, 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

Mr. William P. Dornsife, Acting Director
PA. Dept. of Environmental Resources
Bureau of Radiation Protection
P.O. Box 2063
Harrisburg, PA 17120

GPU NUCLEAR CORPORATION

BY: J. Broughton
Vice President and Director, TM₁-1

DATE: May 19, 1992

Three Mile Island Nuclear Plant, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
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1.0. PROPOSED TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR)

GPUN requests that the following pages of the TMI-1 Technical Specifications (Tech. Specs.) be replaced as indicated below:

Replace Pages: i, v, vi, 1-6, 1-7, 1-8, 3-106, 3-111, 3-118, 3-120, 3-122, 3-125, 3-126, 3-127, 4-107, 4-108, 4-117, 4-118, 4-121, 4-122, 6-11, 6-17, 6-18, 6-19, 6-20, 6-21, 6-22, 6-23, and 6-24. (Note: Pages 6-17 through 6-24 have been re-paginated.)

Add New Pages: 1-9, 6-11a, and 6-25

Delete Pages: 3-121, 3-123, 3-124, 4-119, and 4-120.

2.0. DESCRIPTION OF CHANGES

The following changes relocate the Radiological Environmental Monitoring Program (REMP) portion of the Radiological Environmental Tech. Specs. (RETS) to the Offsite Dose Calculation Manual (ODCM) according to Generic Letter (GL) 89-01. Pursuant to GL 89-01 and NUREG-1301 guidance (Reference 7.1), Revision 1 of the ODCM is included for reference. The revised ODCM, which includes the REMP, is a combined TMI-1 and TMI-2 document. Therefore, the sampling frequencies and locations are site based. A TSCR for TMI-2 was submitted separately. The relocating of procedural details of the RETS to the Process Control Program (PCP), per GL 89-01, allows for concurrent implementation with the proposed TSCR.

In addition, the REMP portion of the TMI-1 Tech. Specs. has been revised to be consistent with the current TMI-1 radiological monitoring program, and in part with NUREG-0472.

1. p i The Table of Contents pages have been updated to reflect the administrative corrections necessary for title changes, deletions, and page numbering changes.
2. p 1-6 Tech. Spec. Definition 1.14, "Solidification" has been relocated to the Process Control Program (PCP), Reference 7.4.
3. p 1-6 Tech. Spec. Definition 1.15, "Offsite Dose Calculation Manual (ODCM)" has been revised pursuant to GL 89-01.
4. p 1-6 Tech. Spec. Definition 1.16, "Process Control Program (PCP)" has been revised pursuant to GL 89-01.
5. p 1-7 Tech. Spec. Definition 1.18, "Ventilation Exhaust Treatment System" has been moved to this page due to reformatting requirements.
6. p 1-8 Tech. Spec. Definition 1.24, "Operating Core Limits Report" has been moved to this page due to reformatting requirements.

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7. p 1-9 New page required due to reformatting.
8. p 3-106 Tech. Spec. 3.22.1.1, "Liquid Effluent - Concentration," Part "b" of the ACTION Statement of this Tech. Spec. has been deleted.
9. p 3-111 Tech. Spec. 3.22.2.1, "Gaseous Effluent - Dose Rate," Part "b" of the ACTION Statement has been deleted. Also, the Bases reference to infant was revised to child to be technically consistent with NUREG-0472.
10. p 3-118 Tech. Spec. 3.22.3, "Solid Radioactive Waste" has been deleted and relocated to the Process Control Program. (Reference 7.4)
11. p 3-120 Tech. Spec. 3.23.1, "Radiological Environmental Monitoring
3-121 Program" (REMP) and Bases, have been deleted and relocated to the Offsite Dose Calculation Manual (ODCM), as revised. [See Part I, Section 7]

NOTE RE: ACTION STATEMENT 'b'

The ODCM reflects the correction of a mis-reference to Tech. Spec. Table 3.23-1, as being deleted and relocated to ODCM Table 7.1 as a part of this TSCR. The appropriate reference for the Action Statement is ODCM Table 7.2, which is the current Tech. Spec. Table 3.23-2 also being deleted and relocated to the ODCM by this TSCR.

In addition, the Action Statement equation relocated to the ODCM has been changed by replacing "limit level" with "reporting Level" in the denominator of the equation; and, the reporting reference to Tech. Spec. 6.9.1.13 in the Action Statement has been deleted and replaced in the ODCM with a requirement to submit a Special Report, which is consistent with the information requirements of Tech. Spec. 6.9.1.13.

12. p 3-122 Tech. Spec. Table 3.23-1 has been deleted and relocated to the
3-123 ODCM as Table 7.1 "Sample Collection and Analysis
3-124 Requirements," with the following additional changes:

The frequencies of sampling and analysis have been changed from a specified number of days to a calendar period (e.g., 7 days has been changed to weekly). A definition of these frequencies has been added to the ODCM that allows the 25% surveillance extension consistent with Section 1.0 of the TMI-1 Tech. Specs.

The number of sample locations for "Direct F iation" was changed from 38 to 40. In addition, the sample locations for Waterborne (Surface and Drinking), Fish, and Food Product pathways have been revised to provide further detail about the types and locations of samples.

13. p 3-125 Tech. Spec. 3.23.2, "Land Use Census" has been relocated to the ODCM and has been revised to be consistent with the proposed TSCR for TMI-2 Tech. Specs., and in part with NUREG-0472. [See Part I, Section 7].

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14. p 3-126 Tech. Spec. Table 3. . 2 has been deleted and relocated to the ODCM as Table 7.2 "Reporting Levels for Radioactivity Concentrations in Environmental Samples," with the following minor revision: (pCi/Dg) was changed to (pCi/Kg) under the column "food Products."
15. p 3-127 Tech. Spec. 3.23.3, "Interlaboratory Comparison," has been relocated to the ODCM. Additionally, a sentence was added that states "only those samples and analyses which are required by Table 7.1 shall be performed." [See Part I, Section 7].
16. p 4-107 Tech. Spec. 4.22.3, "Solid Radioactive Waste" has been deleted and relocated to the Process Control Program. (Reference 7.4)
17. p 4-108 Tech. Spec. 4.22.4, "Total Dose" Calculation, has been revised to reflect the methodology for 40 CFR 190 compliance.
18. p 4-117 Tech. Spec. 4.23.1, REMP "Surveillance Requirements," has been deleted and relocated to the ODCM, as revised. [See Part I, Section 7].
19. p 4-118 Tech. Spec. Table 4.23-1 was deleted and relocated to the ODCM
4-119 as Table 7.3 with its title changed to "Detection Capabilities
4-120 for Environmental Sampling Analysis - Lower Limit of Detection (LLD)." In addition, the ODCM Table Notation was revised in the last part of note 'c' by the addition of a paragraph consistent with NUREG-0472.
20. p 4-121 Tech. Spec. 4.23.2, Land Use "Surveillance Requirements," this specification has been deleted and relocated to the ODCM; and, a sentence was added requiring that the result of the Land Use Census be included in the Annual Radiological Environmental Operating Report. [See Part I, Section 7].
21. p 4-122 Tech. Spec. 4.23.3, Interlaboratory Comparison "Surveillance Requirements," has been deleted and relocated to the ODCM. [See Part I, Section 7].
22. p 6-11 Tech. Spec. 6.8.1.i, "Procedures," the reference to "Regulatory Guide 4.15," has been revised to "Regulatory Guide 4.15, Revision 1".
23. p 6-11a NEW Tech. Spec. 6.8.4, "Radiological Environmental Monitoring Program," has been added pursuant to GL 89-01. Note: Radioactive Effluent Controls remain in the Tech. Specs. and are not being deleted or relocated pursuant to the allowance in GL 89-01.
24. p 6-17 Tech. Spec. 6.9.3, "Annual Radiological Environmental Operating Report," has been revised pursuant to GL 89-01, and the current specification has been relocated to the ODCM. [See Part III - "Reporting Requirements"].

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- 25. P 6-18 Tech. Spec. 6.9.4, "Semiannual Radioactive Effluent Release Report," has been revised pursuant to GL 89-01, and the current specification has been relocated to the ODCM. [See Part III - "Reporting Requirements"].
- 26. p 6-19 Tech. Spec. 6.10 has been moved to page 6-20, and
6-20 Tech. Spec. 6.9.5 is now found in total on page 6-19.
- 27. p 6-21 NEW Tech. Spec. 6.10.3, "Record Retention," has been added pursuant to GL 89-01.
- 28. p 6-22 These pages have been reformatted and re-paginated for clarity.
thru
p 6-25

3.0. REASONS FOR CHANGE

- 3.1. Changes 2-4 - T.S. Definitions 1.14, 1.15, and 1.16;
Changes 10-21 - Tech. Specs. 3.22.3; 3.23.1, .2 and .3;
Tech. Specs. 4.22.3 and .4;
Tech. Specs. 4.23.1, .2, and .3
Changes 23-25 - Tech. Specs. 6.8.4; 6.9.3 and .4;
Change 27 - Tech. Spec. 6.10.3.

These changes are consistent with GL 89-01 and, for the most part, NUREG-0472, Revision 3. Variances from NUREG-0472 reflect current monitoring practices, unique to TMI, and are described in detail in References 7.2 and 7.3.

3.2. Changes 8 and 9 - Tech. Specs. 3.22.1. and .2

These changes are consistent with NUREG-0472 and Reference 7.1. The requirement to shutdown the plant, if releases of liquid or gaseous effluent cannot be immediately restored to within Tech. Spec. limits, is deleted.

3.3. Change 22 - Tech. Spec. 6.8.1.i

This change corrects an administrative discrepancy concerning the reference to Regulatory Guide 4.15 in Tech. Spec. Section 6.0.

3.4. Changes 1, 5-7, 26, and 28 - Administrative

These changes are administrative in nature and are required for editorial corrections, reformatting, and repagination.

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4.0 SAFETY EVALUATION JUSTIFYING CHANGE

- 4.1 Changes 2-4 - T.S. Definitions 1.14, 1.15, and 1.16;
Changes 10-21 - Tech. Specs. 3.22.3; 3.23.1, .2 and .3;
Tech. Specs. 4.22.3, and 4;
Tech. Specs. 4.23.1, .2 and .3;
Changes 23-25 - Tech. Specs. 6.8.4; 6.9.3 and .4;
Change 27 - Tech. Spec. 6.10.3.
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These changes relocate a portion of the TMI-1 RETS to either the ODCM or the PCP. This change request is consistent with the guidance contained in NRC GL 89-01, dated January 31, 1989 and incorporates line-item improvements in Tech. Specs.

Additionally, the proposed changes are, for the most part, consistent with NUREG-0472. Justification for variances from this NUREG is provided in References 7.2 and 7.3. For example, since the REMP is a site program, monitoring for Sr-90 (i.e., a TMI-2 accident generated isotope) is performed.

4.2 Changes 8 and 9 - Tech. Specs. 3.22.1. and .2

The proposed change is consistent with NUREG-0472 and Reference 7.1, in that, the provisions for plant shutdown required by TMI-1 Tech. Spec. 3.0.1 do not apply. Operation of the plant during a liquid or gaseous effluent release would not adversely affect public health and safety since a filtered pathway and continuous effluent monitoring would be maintained.

4.3 Change 22 - Tech. Spec. 6.8.1.i

This change is administrative in nature to correct a discrepancy between Section 6.5.3.1.j and Section 6.8.1.i, which requires that the REMP procedures satisfy Regulatory Guide (RG) 4.15. When Tech. Spec. 6.8.1.i was added via License Amendment 77 (dated April 28, 1982), Revision 1 of RG 4.15 was in effect. This is still the current revision of the Guide. The TMI REMP was developed in accordance with Revision 1; and, therefore, the annual audit of the REMP is conducted using Revision 1.

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5.0 NO SIGNIFICANT HAZARDS CONSIDERATIONS

GPUN has determined that this Technical Specification Change Request involves no significant hazards consideration as defined by NRC in 10 CFR 50.92.

- 5.1 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 amendment allows relocation of portions of the RETS to either the ODCM or PCP according to the guidance contained in GL 89-01. This proposal simplifies the RETS, meets the regulatory requirements for radioactive effluent and radiological environmental monitoring, and is provided as a line-item improvement of the Tech. Specs. Variances in the RETS from NUREG-0472 have been reviewed and approved by the NRC (Reference 7.3). Thus, this change does not increase the probability of occurrence or consequences of an accident previously evaluated.

- 5.2 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 accident previously evaluated.

The proposal relocates procedural details, currently included in the Tech. Spec. Amendment, on radioactive effluent, solid radioactive wastes, environmental monitoring, and associated reporting requirements to the ODCM or PCP as appropriate. Future changes to these procedural details in the ODCM and the PCP will be handled under the administrative controls for changes to these documents. Therefore, this change has no effect on the possibility of creating a new or different kind of accident from any accident previously evaluated.

- 5.3 Operation of the facility in accordance with the proposed amendment would not involve a significant reduction in a margin of safety.

The procedural details being relocated to the ODCM or the PCP are consistent with the guidance provided in GL 89-01 and NUREG-0472. Therefore, it is concluded that operation of the facility in accordance with the proposed amendment does not involve a significant reduction in a margin of safety.

The Commission has provided guidelines on the application of the three standards by listing specific examples in 45 FR 14870. The proposed amendment is considered to be in the same category as example (vi) of amendments that are considered not likely to involve significant hazards consideration in that the proposed change conforms to changes provided in NRC Generic Letter 89-01.

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5.3 (Continued)

Implementation of the proposed amendment according to the guidance contained in NRC Generic Letter 89-01 incorporates a line-item improvement in Technical Specifications. Thus, operation of the facility in accordance with the proposed amendment involves no significant hazards considerations.

6.0 IMPLEMENTATION

It is requested that the amendment authorizing this change become effective within 60 days upon issuance to allow time for implementation of affected procedure changes.

7.0 REFERENCES

- 7.1 NUREG-1301, "Offsite Dose Calculation Manual Guidance: Standard Radiological Effluent Controls for Pressurized Water Reactors."
- 7.2 GPU Nuclear letter 4410-86-L-005, dated May 16, 1986, "Technical Specification Change Request No. 52."
- 7.3 NRC letter dated March 17, 1988, "Issuance of Amendment No. 29 to Facility Operating License No. DPR-73 for Three Mile Island Nuclear Station, Unit 2."
- 7.4 TMI-1 Operating Procedure 1104-28I, "Waste Solidification Process Control Program."