

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License DPR-73
Docket No. 50-320

Technical Specification Change Request (TSCR) No. 67 and Recovery Operations Plan Change Request (ROPCR) No. 46

The Licensee requests that the attached changed pages of the Appendix A Technical Specifications (Tech. Specs.) (i.e., ii, iii, vi, ix, x, 1-6, 3.3-1, 3.3-2, 3.3-3, B 3/4 3-1, B 3/4 3-2, B 3/4 3-3, 5-1, 6-8, 6-10a, and 6-11 through 6-17) replace the corresponding pages in the Appendix A Tech. Specs. The Licensee also requests that the attached changed pages of the Appendix B Tech. Specs. (i.e., i, ii, 1-1, 2-1, 3-1, and 5-3 through 5-9) replace pages i, ii, 1-1 through 1-4, 2-1 through 2-16, 3-1, 3.2-1 through 3.2-12, and 5-3 through 5-9 in the Appendix B Tech. Specs. Finally, the Licensee requests that the attached changed pages of the TMI-2 Recovery Operations Plan (ROP) (i.e., i, 4.3-1, and 4.3-4 through 4.3-8) replace the corresponding pages in the ROP.

Pursuant to NRC Generic Letter 89-01, dated January 31, 1989, a copy of the ODCM is included for NRC reference. The ODCM is a combined TMI-1 and TMI-2 document; therefore, the sampling frequencies and locations are done on a site basis.

Description of Change

The Tech. Specs. related to radiological effluents are being relocated to the Offsite Dose Calculation Manual (ODCM), in accordance with NRC Generic Letter 89-01. Accordingly, Sections 1.22, 1.23, 1.24, 1.25, 6.8.4, and 6.13, are being added to the Appendix A Tech. Specs.; Sections 3.3.3.1 and 3/4.3.3.1 are being deleted from the Appendix A Tech. Specs.; and Sections 5.1.3, 5.1.4, 6.5.3.1, 6.8, 6.9, and 6.10 of the Appendix A Tech. Specs. are being revised. Further, Appendix B Tech. Spec. Sections 2.1, 3.2, 5.5, 5.5.2, 5.5.3, 5.5.4, and 5.6.1 A.(2) and C. are being deleted and Sections 1.0, 5.4, and 5.6.2 are being revised. Finally, ROP Section 4.3.3.1 and Table 4.3-3 are being deleted.

In addition, the required frequency of the Quarterly Dose Assessment Report and Semi-annual Radioactive Effluent Release Report is being changed to "annual."

Reason for Change

Generic Letter 89-01 provides guidance on the relocation of the Radiological Effluent Tech. Specs. to the ODCM. This TSCR is being proposed in accordance with that generic letter. The corresponding changes to the Appendix A Tech. Specs., the Appendix B Tech. Specs., and the ROP were accomplished in accordance with Generic Letter 89-01. However, since there are currently no TMI-2 Recovery Tech. Specs. addressing solid radioactive wastes and no related Process Control Program (PCP), per se, that portion of the generic letter guidance will not be incorporated. Finally, 10 CFR 50.36a was amended (57 FR-169, August 31, 1992) to required annual submittal of radiological effluent reports. This rule change has been adopted.

Justification of Change

The following is a section by section justification of the Tech. Specs. and ROP changes requested herein:

Appendix A

Sections 1.22, 1.23, 1.24, and 1.25

The definition for ODCM is being added in accordance with Generic Letter 89-01. Also added are the definitions for MEMBER(S) OF THE PUBLIC, UNRESTRICTED AREA, and SITE BOUNDARY.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

Section 3.3.3.1 - Radiation Monitoring Instrumentation

The Limiting Condition for Operation (LCO) requiring operability of the TMI-2 radiation monitors is being relocated to the ODCM.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

Section 3/4.3.3.1 - Radiation Monitoring Instrumentation

The Basis for the LCO on radiation monitors is being relocated to the ODCM.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

Section 5.1.3 - Site Boundary for Gaseous Effluents

This section is being revised to reference the ODCM.

Justification of Change

This change is being accomplished as requested by the NRC during the public meeting held on May 21, 1991.

Section 5.1.4 - Site Boundary for Liquid Effluents

This section is being revised to reference the ODCM.

Justification of Change

This change is being accomplished as requested by the NRC during the public meeting held on May 21, 1991.

Section 6.5.3 - Audits

A requirement to audit the ODCM and its implementing documents is being added consistent with the TMI-1 Tech. Specs.

Justification of Change

Quality Assurance requirements for radiological programs are contained in TMI-2 Tech. Specs. Appendix B Section 5.5.2 which is being deleted. Since both the Radioactive Effluent Controls Program (RECP) and the Radiological Environmental Monitoring Program (REMP) are contained in the ODCM, the proposed audit requirement incorporates the to-be-deleted Appendix B Tech. Spec. and is consistent with the TMI-1 Tech. Specs.

Section 6.8 - Procedures and Programs

The title of this section is being changed from "Procedures" to "Procedures and Programs."

Justification of Change

The inclusion of the programmatic controls for the RECP and the REMP into this section necessitates the change in the title.

Section 6.8.4

Programmatic controls for the RECP and the REMP are being included in the Appendix A Tech. Specs.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

Section 6.9 - Reporting Requirements

The requirements for the Annual Radiological Environmental Operating Report and the Annual Radioactive Effluent Release Report are being added to the Appendix A Tech. Specs. The requirement for a Quarterly Dose Assessment Report and a Semi-annual Effluent Release Report are being deleted.

Justification of Change

The annual report is being added as prescribed in Generic Letter 89-01. The quarterly and semi-annual reports which were requirements of the Appendix B Tech. Specs. are being deleted in accordance with the amendment of 10 CFR 50.36a (57 FR-169, August 31, 1992).

Section 6.10 - Records Retention

The requirement to retain the records of reviews performed for changes made to the ODCM is being added to the Appendix A Tech. Specs.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

Section 6.13 - Off-site Dose Calculation Manual

Administrative controls related to the ODCM are being added to the Appendix A Tech. Specs.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

APPENDIX B

1.0 - Definitions

All definitions except the "NPDES Permit" definition are being deleted.

Justification of Change

Applicable definitions are contained in the Appendix A Tech. Specs. or the ODCM, as necessary.

2.0 - Limiting Conditions for Operation

The entire section is being relocated to the ODCM as Part II Sections 2.0 and 3.0. The only changes made to this section are renumbering and typographical corrections.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

3.2 - Radiological Environmental Monitoring

The entire section is being relocated to the ODCM as Part I Section 8.0. Since Part I of the ODCM applies to both TMI-1 and TMI-2, there were instances where the original Tech. Spec. requirements for Units 1 and 2 were not exactly the same. In those cases, the more restrictive requirement was incorporated in ODCM Part I Section 8.0. The only other changes made to this section are renumbering and typographical corrections.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

5.4 - State and Federal Permits and Certificates

The references to Sections 2 and 3 are being deleted.

Justification of Change

Sections 2 and 3 are being deleted in their entirety; therefore, references to these sections should be deleted.

5.5 - Procedures

This section is being deleted in its entirety.

Justification of Change

Radiological programmatic controls are being relocated to the Appendix A Tech. Specs. Section 6.8.4.

5.5.2 - Quality Assurance of Program Results

This section is being deleted in its entirety.

Justification of Change

Quality Assurance requirements for radiological programs are contained in the Appendix A Tech. Specs. Section 6.8.4.

5.5.3 - Compliance with Procedures

This section is being deleted in its entirety.

Justification of Change

Programmatic controls are being relocated to the Appendix A Tech. Specs. Section 6.8.4.

5.5.4 - Changes in Procedures, Station Design, or Operation

This section is being deleted in its entirety.

Justification of Change

Radiological programmatic controls are being relocated to the Appendix A Tech. Specs. Section 6.8.4. In addition, technical review and control is addressed in the Appendix A Tech. Specs. Section 6.5.1.

5.6 - Station Report Requirements

5.6.1 - Routine Reports

Section 5.6.1.A.(2), pertaining to radiological reporting, is being relocated to the Appendix A Tech. Specs. Section 6.9.1.1 and the ODCM Part III Section 1.0. Section 5.6.1.C. is being relocated to the Appendix A Tech. Specs. Section 6.9.1.3 and the ODCM Part III Section 3.0.

Justification of Change

The relocation of Section 5.6.1.A.(2) is being accomplished as prescribed in Generic Letter 89-01. The requirement for an annual effluent release report is replacing the

current Quarterly Dose Assessment Report requirement of 5.6.1.C consistent with the amended requirements of 10 CFR 50.36a (57 CFR-169, August 31, 1992).

5.6.2 - Nonroutine Reports

The reference to Section 2.0 is being deleted.

Justification of Change

Section 2.0 is being deleted in its entirety; therefore, reference to this section should be deleted.

Recovery Operations Plan

4.3.3.1 - Radiation Monitoring Instrumentation

The surveillance requirements of the TMI-2 radiation monitors are being relocated to the ODCM.

Justification of Change

This change is being accomplished as prescribed in Generic Letter 89-01.

No Significant Hazards Consideration

10 CFR 50.92 provides the criteria which the Commission uses to evaluate a No Significant Hazards Consideration. 10 CFR 50.92 states that an amendment to a facility license involves No Significant Hazards if operation of the facility in accordance with the proposed amendment would not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated, or
2. Create the possibility of a new or different kind of accident from any accident previously evaluated, or
3. Involve a significant reduction in a margin of safety.

The proposed change to relocate the radiological effluent monitoring requirements from the TMI-2 Recovery Technical Specifications to the ODCM has no impact on the safety of the evolutions occurring at TMI-2. This proposed change adheres to the guidance provided in Generic Letter 89-01 by implementing the programmatic controls in the Tech. Specs. and relocating the procedural details to the ODCM.

The proposed change to delete the requirements for quarterly dose assessment and semi-annual radioactive effluent release reporting in favor of an annual reporting is being accomplished in accordance with the provisions of 10 CFR 50.36a(a)(2) made effective October 1, 1992.

These changes simplify the radiological effluent Tech. Specs. (RETS) and meet the regulatory requirements for radioactive effluents and radiological environmental monitoring.

Therefore, the proposed changes do not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. The relocation of the RETS to the ODCM does not alter the requirements currently being followed by TMI-2. Changing the reporting requirements from quarterly and semi-annually to annually simplifies the RETS, meets the regulatory requirements for radioactive effluent and radiological environmental monitoring, and is considered a line-item improvement of the Tech. Specs. Therefore, there is no increase in the probability or consequences of an accident previously evaluated.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated. The relocation of the RETS to the ODCM does not alter the requirements currently being followed by TMI-2. Changing the reporting requirements from quarterly and semi-annually to annually simplifies the RETS, meets the regulatory requirements for radioactive effluent and radiological environmental monitoring, and is considered a line-item improvement of the Tech. Specs. Therefore, there is no possibility of a new or different kind of accident from any accident previously evaluated.
3. Involve a significant reduction in a margin of safety. There is no impact on any margin of safety. The relocation of the RETS to the ODCM does not alter the requirements currently being followed by TMI-2. The administrative revision of the frequency of reporting has no impact on any margin of safety.

Based on the above analysis, it is concluded that the proposed changes involve no significant hazards considerations as defined by 10 CFR 50.92.

Implementation

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

THREE MILE ISLAND - UNIT 2

TECHNICAL SPECIFICATIONS

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1.0 DEFINITIONS

1.21 CONTAINMENT ISOLATION shall exist when:

- a. Each penetration is:
 1. Closed by an accessible manual valve, a welded or bolted blind flange, or a deactivated automatic valve secured in the closed position to provide isolation of each penetration, or;
 2. Open per an approved procedure but can be closed pursuant to Specification 1.21.a.1. Controls shall be implemented to minimize the time the penetration is allowed open and to specify the conditions for which the penetration is open. Penetrations shall be expeditiously closed upon completion of the conditions specified in the approved procedures.
- b. The Equipment Hatch is closed and sealed.
- c. Each Containment Airlock is OPERABLE pursuant to Specification 3.6.1.6.

1.22 The OFFSITE DOSE CALCULATION MANUAL (ODCM) shall contain the methodology and parameters used in the calculation of off-site doses resulting from radioactive gases and liquid effluents, in the calculation of gaseous and liquid effluent monitoring Alarm/Trip Setpoints, and in the conduct of the Environmental Radiological Monitoring Program. The ODCM shall also contain (1) the Radioactive Effluent Controls and Radiological Environmental Monitoring Programs required by Section 6.8.4 and (2) descriptions of the information that should be included in the Annual Radiological Environmental Operating Report and the Annual Radioactive Effluent Release Report required by Specifications 6.9.1.1 and 6.9.1.2, respectively.

1.23 MEMBER(S) OF THE PUBLIC shall include all persons who are not occupationally associated with the plant. This category does not include employees of the GPU System, GPU contractors or vendors. Also excluded from this category are persons who enter the site to service equipment or to make deliveries.

1.24 UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access which is not controlled by the licensee for purposes of protection of individuals from exposure to radiation and radioactive materials, or any area within the SITE BOUNDARY used for residential quarters or for industrial, commercial, institutional, and/or recreational purposes.

1.25 SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by GPU Nuclear.

LIMITING CONDITIONS FOR OPERATION

3.3 INSTRUMENTATION

3.3.1 NEUTRON MONITORING INSTRUMENTATION

INTERMEDIATE AND SOURCE RANGE NEUTRON FLUX MONITORS

3.3.1.1 As a minimum, the intermediate and source range neutron monitoring instrumentation channels of Table 4.3-1 of the RECOVERY OPERATIONS PLAN shall be OPERABLE.

APPLICABILITY: MODE 1

ACTION:

- a. With the number of source range neutron monitoring channels OPERABLE one less than required by the Minimum Channels OPERABLE requirement of Table 4.3-1 of the RECOVERY OPERATIONS PLAN, restore the inoperable channel to OPERABLE status within 30 days.
- b. With no source range neutron monitoring channels OPERABLE, suspend all activities involving CORE ALTERATION, verify compliance with the boron concentration requirements of Specification 3.1.1.2 at least once per 24 hours by a mass balance calculation and at least once per 7 days by a chemical analysis and restore at least one source range neutron monitoring channel to OPERABLE status within 7 days.
- c. With no intermediate range neutron monitoring channels OPERABLE, restore at least one intermediate range channel to OPERABLE status within 7 days.

3.3.2 ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

Deleted

3.3.3 MONITORING INSTRUMENTATION

METEOROLOGICAL INSTRUMENTATION

3.3.3.4 The meteorological monitoring instrumentation channels shown in Table 4.3-5 of the RECOVERY OPERATIONS PLAN shall be OPERABLE.

APPLICABILITY: MODES 1 AND 2

ACTION:

With any of the above required meteorological monitoring channels inoperable, restore the inoperable channel(s) to OPERABLE status within 7 days.

LIMITING CONDITIONS FOR OPERATION

ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION

3.3.3.5 The Essential Parameters Monitoring Instrumentation shall be OPERABLE in accordance with the requirements of Table 4.3-7 of the RECOVERY OPERATIONS PLAN.

APPLICABILITY: MODE 1

ACTION:

For instrumentation not in accordance with the requirements of Table 4.3-7 of the RECOVERY OPERATIONS PLAN, restore the inoperable instrument(s) to the requirements of Table 4.3-7 of the RECOVERY OPERATIONS PLAN within 72 hours.

CHLORINE DETECTION SYSTEMS

3.3.3.7 Two Chlorine Detection Systems, with their alarm/trip setpoints adjusted to actuate at a chlorine concentration of less than or equal to 5 ppm, shall be OPERABLE:

- a. One at the air intake tunnel, and
- b. One at the Control Room air supply duct.

APPLICABILITY: MODE 1

ACTION:

With one or more Chlorine Detection Systems inoperable, within 1 hour initiate and maintain operation of the Control Room Emergency Ventilation System in the recirculation mode of operation; restore the inoperable detection system to OPERABLE status within 30 days.

FIRE DETECTION INSTRUMENTATION

3.3.3.8 As a minimum, the fire detection instrumentation for each fire detection zone shown in Table 4.3-11 of the RECOVERY OPERATIONS PLAN shall be OPERABLE.

APPLICABILITY: MODES 1, 2 and 3

ACTION:

With the number of OPERABLE fire detection instruments less than required by Table 4.3-11 in the RECOVERY OPERATIONS PLAN, insure that an alternate instrument with the same coverage is OPERABLE, or;

1. Within 1 hour, establish a fire watch patrol to inspect the zone with the inoperable instrument(s) at least once per hour, and
2. Restore the inoperable instrument(s) to OPERABLE status within 14 days.

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3/4.3 INSTRUMENTATION

BASES

3/4.3.1 NEUTRON MONITORING INSTRUMENTATION

The neutron monitoring instrumentation, which was included in the normal Reactor Protection System Instrumentation, provides information regarding the shutdown status of the core and it will be used to monitor changes in neutron generation.

3/4.3.2 ENGINEERED SAFETY FEATURES ACTUATION SYSTEM INSTRUMENTATION

Deleted

3/4.3.3 MONITORING INSTRUMENTATION

3/4.3.3.4 METEOROLOGICAL INSTRUMENTATION

The OPERABILITY of the meteorological instrumentation ensures that sufficient meteorological data is available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public.

3/4.3.3.5 ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION

The OPERABILITY of the Essential Parameters Monitoring Instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess these variables. Reactor Coolant System temperature indication is provided outside the Control Room in the event that Control Room habitability is lost.

3/4.3.3.7 CHLORINE DETECTION SYSTEMS

The OPERABILITY of the chlorine detection systems ensures that an accidental chlorine release will be detected promptly and the Control Room Emergency Ventilation System will automatically isolate the Control Room and initiate its operation in the recirculation mode to provide the required protection.

3/4.3 INSTRUMENTATION

BASES

3/4.3.3.8 and 3/4.3.3.9 FIRE DETECTION INSTRUMENTATION

OPERABILITY of the Fire Detection Instrumentation ensures that adequate warning capability as required by the TMI-2 Fire Protection Program Evaluation, is available for the prompt detection of fires. The capability is required in order to detect and locate fires in their early stages. Prompt detection of fires is an integral element in the overall facility fire protection program.

In the event that a portion of the Fire Detection Instrumentation is inoperable, the establishment of frequent fire patrols in the affected areas is required to provide detection capability until the inoperable instrumentation is returned to service. For purposes of ALARA considerations, remote mechanisms (e.g., CCTV coverage) may be utilized to perform the fire patrol. However, the inoperability of this instrument would not affect the capability to maintain the safe shutdown condition of the plant nor the ability to prevent offsite releases greater than 10 CFR 100 limits.

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5.0 DESIGN FEATURES

5.1 SITE

EXCLUSION SITE

5.1.1 The exclusion area is shown on Figure 5.1-1.

LOW POPULATION ZONE

5.1.2 The low population zone is shown on Figure 5.1-2.

SITE BOUNDARY FOR GASEOUS EFFLUENTS

5.1.3 The SITE BOUNDARY for gaseous effluents shall be as shown in the ODCM.

SITE BOUNDARY FOR LIQUID EFFLUENTS

5.1.4 The SITE BOUNDARY for liquid effluents shall be as shown in the ODCM.

5.2 CONTAINMENT

CONFIGURATION

5.2.1 The reactor containment building is a steel lined, reinforced concrete building of cylindrical shape, with a dome roof and having the following design features:

- a. Nominal inside diameter = 130 feet
- b. Nominal inside height = 157 feet
- c. Minimum thickness of concrete walls = 4 feet
- d. Minimum thickness of concrete roof = 3.5 feet
- e. Minimum thickness of concrete floor pad = 13.5 feet
- f. Nominal thickness of steel liner = 1/2 inches
- g. Net free volume = 2.1×10^6 cubic feet

DESIGN PRESSURE AND TEMPERATURE

5.2.2 The reactor containment building is designed and shall be maintained for a maximum internal pressure of 2 psig and a temperature of 286°F.

ADMINISTRATIVE CONTROLS

- d. During Modes 1, 2, and 3, the performance of activities required by the Recovery Quality Assurance Plan to meet the criteria of Appendix "B", 10 CFR 50. The audit frequency shall be at least once per 24 months.
- e. During Mode 1, the Emergency Plan and implementing procedures. The audit frequency shall be at least once per 12 months.
- f. Deleted.
- g. During Modes 1, 2, and 3, the Radiation Protection Plan and implementing procedures. The audit frequency shall be at least once per 12 months.
- h. During Modes 1, 2, and 3, the Fire Protection Program and implementing procedures. The audit frequency shall be at least once per 24 months.
- i. During Modes 1, 2, and 3, an independent fire protection and loss prevention program inspection and technical audit shall be performed annually utilizing either qualified offsite licensee personnel or an outside fire protection firm.
- j. During Modes 1, 2, and 3, an inspection and technical audit of the fire protection and loss prevention program, by an outside qualified fire consultant at intervals no greater than 3 years.
- k. During Modes 1, 2, and 3, any other area of unit operation considered appropriate by the SRG (until implementation of IOSRG), the Manager, SRG's immediate supervisor, the IOSRG, other managers reporting directly to the Office of the Director TMI-2, the Office of the Director TMI-2, or the Office of the President - GPUNC. Any other areas required to be audited by QA will be identified to the appropriate QA Management level.
- l. The ODCM and implementing procedures at least once per 24 months.

RECORDS

6.5.3.2 Audit reports encompassed by Section 6.5.3.1 shall be forwarded for action to the management positions responsible for the areas audited and either the SRG, (until implementation of IOSRG) or the IOSRG (upon its implementation), within 60 days after completion of the audit. The SRG, (until implementation of IOSRG) or the IOSRG will review specified audits performed by QA and make corrective action recommendations as appropriate.

6.5.4 SAFETY REVIEW GROUP (SRG)

FUNCTION

6.5.4.1 The SRG shall be a full-time group of engineers, independent of the Site Operations and Engineering staff, and located onsite within the TMI-2 division. (See Organization Plan Figure 1.2.)

APPLICABILITY

6.5.4.1.1 Until implementation of IOSRG.

ADMINISTRATIVE CONTROLS

AUTHORITY

6.5.5.4 The IOSRG shall have access to the unit and unit records as necessary to perform its evaluations and assessments. Based on its reviews, the IOSRG shall provide recommendations to the management positions responsible for the areas reviewed.

QUALIFICATIONS

6.5.5.5 The IOSRG engineers shall have either: (1) a Bachelor's Degree in Engineering or the Physical Sciences and three years of professional level experience in the nuclear power field including technical supporting functions, or (2) eight years of appropriate experience in nuclear power plant operations and/or technology. Credit toward experience will be given for advance degrees on a one-to-one basis up to a maximum of two years.

RECORDS

6.5.5.6 Reports of evaluations and assessments encompassed in Section 6.5.5.3 shall be prepared, approved, and transmitted to the Office of the Director, TMI-2, the division vice president responsible for nuclear safety assessment and the management positions responsible for the areas reviewed.

6.6 REPORTABLE EVENTS ACTION

6.6.1 The following actions shall be taken for REPORTABLE EVENTS:

- a. The Commission shall be notified and/or a report submitted pursuant to the requirements of Section 50.73 of 10 CFR Part 50, and
- b. Until implementation of IOSRG, each REPORTABLE EVENT shall be investigated and reviewed by the SRG, including the preparation and forwarding of reports covering evaluation and recommendations to prevent recurrence. A report shall be submitted to the Manager, SRG's immediate supervisor and the Office of the Director, TMI-2. Upon implementation of IOSRG, each REPORTABLE EVENT shall undergo an independent safety review, by a qualified ISR. This review may be performed after the fact.
- c. Deleted.

6.7 SECTION DELETED

6.8 PROCEDURES AND PROGRAMS

6.8.1 Written procedures shall be established, implemented and maintained covering the activities referenced below:

- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
- b. Recovery Operations Plan implementation.
- c. Surveillance and test activities of safety-related equipment and radioactive waste management equipment.

ADMINISTRATIVE CONTROLS

6.8.2.1 Each procedure and any change to any procedure prepared pursuant to 6.8.1, shall be prepared, reviewed and approved in accordance with 6.5 and will be reviewed periodically as required by ANSI 18.7 - 1976.

6.8.2.2 Deleted.

6.8.3.1 Temporary changes to procedures of 6.8.1 may be made provided that:

- a. The intent of the original procedure control is not altered, and
- b. (1) For those procedures which affect the operational status of unit systems or equipment, the change is approved by two members of the unit management staff, at least one of whom holds a Senior Reactor Operator's License. (Note: The requirement for a Senior Reactor Operator's License applies during Mode 1 only.) If one of the two above signatures is not by a supervisory person within the Department having cognizance of the procedure being changed, the signature of that supervisory person within the department will also be required, or

2) For those procedures which do not affect the operational status of unit systems or equipment, the change is approved by two members of the responsible organization. If one of the two above signatures is not by a section manager/director within the Department having cognizance of the procedure being changed, the signature of that section manager/director within the department will also be required, and
- c. The change is documented, Independent Safety Review completed, and the required reviews and approvals are obtained within 14 days, and
- d. Those changes to procedures required by Specification 3.9.13 are submitted to the NRC for review within 72 hours following approval by the management level specified for implementation by Section 6.5.1.9.

6.8.4 The following programs shall be established, implemented, and maintained:

a. Radioactive Effluent Controls Program

A program shall be provided conforming with 10 CFR 50.36a for the control of radioactive effluents and for maintaining the doses to MEMBER(S) OF THE PUBLIC from radioactive effluents as low as is reasonably achievable. The program (1) shall be contained in the ODCM, (2) shall be implemented by operating procedures, and (3) shall include remedial actions to be taken whenever the program limits are exceeded. The program shall include the following elements:

- 1) Limitations on the operability of radioactive liquid and gaseous monitoring instrumentation including surveillance tests and setpoint determination in accordance with the methodology in the ODCM,

- 2) Limitations on the concentrations of radioactive material released in liquid effluents to UNRESTRICTED AREAS conforming to 10 CFR Part 20, Appendix B, Table II, Column 2.
- 3) Monitoring, sampling, and analysis of radioactive liquid and gaseous effluents in accordance with 10 CFR 20.106 and with the methodology and parameters in the ODCM,
- 4) Limitations on the annual and quarterly doses or dose commitment to a MEMBER OF THE PUBLIC from radioactive materials in liquid effluents released from each unit to UNRESTRICTED AREAS conforming to Appendix I to 10 CFR Part 50,
- 5) Determination of cumulative and projected dose contributions from radioactive effluents for the current calendar quarter and current calendar year in accordance with the methodology and parameters in the ODCM at least every 31 days,
- 6) Limitations on the operability and use of the liquid and gaseous effluent treatment systems to ensure that the appropriate portions of these systems are used to reduce releases of radioactivity when the projected doses in a 31-day period would exceed 2 percent of the guidelines for the annual dose or dose commitment conforming to Appendix I to 10 CFR Part 50,
- 7) Limitations on the dose rate resulting from radioactive material released in gaseous effluents to areas beyond the SITE BOUNDARY conforming to the doses associated with 10 CFR Part 20, Appendix B, Table II, Column 1,
- 8) Limitations on the annual and quarterly air doses resulting from noble gases released in gaseous effluents from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50,
- 9) Limitations on the annual and quarterly doses to a MEMBER OF THE PUBLIC from tritium and all radionuclides in particulate form with half-lives greater than 8 days in gaseous effluents released from each unit to areas beyond the SITE BOUNDARY conforming to Appendix I to 10 CFR Part 50.

b. Radiological Environmental Monitoring Program

A program shall be provided to monitor the radiation and radionuclides in the environs of the plant. The program shall provide (1) representative measurements of radioactivity in the highest potential exposure pathways, and (2) verification of the accuracy of the effluent monitoring program and modeling of environmental exposure pathways. The program shall (1) be contained in the ODCM, (2) conform to the guidance of Appendix I to 10 CFR Part 50, and (3) include the following:

- 1) Monitoring, sampling, analysis, and reporting of radiation and radionuclides in the environment in accordance with the methodology and parameters in the ODCM,
- 2) A Land Use Census to ensure that changes in the use of areas at and beyond the SITE BOUNDARY are identified and that modifications to the monitoring program are made if required by the results of this census, and
- 3) Participation in an Interlaboratory Comparison Program to ensure that independent checks on the precision and accuracy of the measurements of radioactive materials in environmental sample matrices are performed as part of the quality assurance program for environmental monitoring.

6.9 REPORTING REQUIREMENTS

ROUTINE REPORTS AND REPORTABLE OCCURRENCES

6.9.1 In addition to the applicable reporting requirements of Title 10, Code of Federal Regulations, the following reports shall be submitted in accordance with 10 CFR 50.4 unless otherwise noted.

ANNUAL RADIOLOGICAL ENVIRONMENTAL OPERATING REPORT¹

6.9.1.1 The Annual Radiological Environmental Operating Report covering the operation of the unit during the previous calendar year shall be submitted before May 1 of each year. The report shall include summaries, interpretations, and analysis of trends of the results of the Radiological Environmental Monitoring Program for the reporting period. The material provided shall be consistent with the objectives outlined in (1) the ODCM and (2) Sections IV.B.2, IV.B.3, and IV.C of Appendix I to 10 CFR Part 50.

ANNUAL RADIOACTIVE EFFLUENT RELEASE REPORT²

6.9.1.2 The Annual Radioactive Effluent Release Report covering the operation of the unit during the previous calendar year shall be submitted within 60 days after January 1 of each year. The report shall include a summary of the quantities of radioactive liquid and gaseous effluents and solid waste released from the unit. The material provided shall be (1) consistent with the objectives outlined in the ODCM and (2) in conformance with 10 CFR 50.36a and Section IV.B.1 of Appendix I to 10 CFR Part 50.

¹ A single submittal may be made for a multi-unit station.

² A single submittal may be made for a multi-unit station. The submittal should combine those sections that are common to all units at the station; however, for units with separate radwaste systems, the submittal shall specify the releases of radioactive material from each unit.

ANNUAL REPORTS¹

6.9.1.4 Annual reports covering the activities of the unit as described below during the previous calendar year shall be submitted prior to March 1 of each year.

6.9.1.5 Reports required on an annual basis shall include:

- a. A tabulation of the number of station, utility and other personnel (including contractors) receiving exposures greater than 100 mrem/yr and their associated manrem exposure according to work and job functions,² e.g., reactor operations and surveillance, in-service inspection, routine maintenance, special maintenance (describe maintenance), waste processing, and refueling. The dose assignment to various duty functions may be estimates based on pocket dosimeter, TLD, or film badge measurements. Small exposures totalling less than 20% of the individual total dose whole body dose received from external sources shall be assigned to specific major work functions.
- b. The following information on aircraft movements at the Harrisburg International Airport:
 1. The total number of aircraft movements (takeoffs and landings) at the Harrisburg International Airport for the previous twelve-month period.
 2. The total number of movements of aircraft larger than 200,000 pounds, based on a current percentage estimate provided by the airport manager or his designee.

RADIATION SAFETY PROGRAM REPORT

6.9.1.6 Deleted.

REPORTABLE OCCURRENCES

6.9.1.7 Deleted.

PROMPT NOTIFICATION WITH WRITTEN FOLLOWUP

6.9.1.8 Deleted

1 A single submittal may be made for a multiple unit station. The submittal should combine those sections that are common to all units at the station.

2 This tabulation supplements the requirements of §20.407 of 10 CFR Part 20.

ADMINISTRATIVE CONTROLS

THIRTY DAY WRITTEN REPORTS

6.9.1.9 Deleted.

REPORTING REQUIREMENTS FOR INCIDENT WHICH OCCURRED ON MARCH 28, 1979

6.9.1.10 Section deleted. All reporting requirements completed.

SPECIAL REPORTS

6.9.2 Special reports shall be submitted in accordance with 10 CFR 50.4 within the time period specified for each report.

6.10 RECORD RETENTION

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

- a. Records of sealed source and fission detector leak tests and results.
- b. Records of annual physical inventory of all sealed source material of record.
- c. Records of changes made to the procedures required by Specifications 6.8.1.d and e.

6.10.2 The following records shall be retained as long as the Licensee has an NRC license to operate or possess the Three Mile Island Facility.

- a. Records and logs of unit operation covering time interval at each power level.
- b. Records and logs of principal maintenance activities, inspection, repair and replacement of principal items of equipment related to nuclear safety and radioactive waste systems.
- c. ALL REPORTABLE EVENTS submitted to the Commission.
- d. Records of surveillance activities, inspections and calibrations required by these Technical Specifications.
- e. Records of changes made to the procedures required by Specifications 6.8.1.a, b, c, and f.
- f. Radiation Safety Program Reports and Quarterly Recovery Progress Reports on the March 28, 1979, incident
- g. Records of radioactive shipments.
- h. Records and logs of radioactive waste systems operations.

ADMINISTRATIVE CONTROLS

- i. Records and drawing changes reflecting facility design modifications made to systems and equipment described in the Safety Analysis Report, TER, SD, or Safety Evaluation previously submitted to NRC.
- j. Records of new and irradiated fuel inventory, fuel transfers and assembly burnup histories.
- k. Records of transient or operational cycles for those unit components designed for a limited number of transients or cycles.
- l. Records of reactor tests and experiments.
- m. Records of training and qualification for current members of the unit staff.
- n. Records of in-service inspections performed pursuant to these Technical Specifications.
- o. Records of Quality Assurance activities required by the Operating Quality Assurance Plan.
- p. Records of reviews performed for changes made to procedures or equipment or reviews of tests and experiments pursuant to 10 CFR 50.59.
- q. Records of meetings of the Plant Operation Review Committee (PORC) and the General Review Committee (GRC) and reports of evaluations prepared by the SRG or by the IOSRG, if applicable to TMI-2.
- r. Records of the incident which occurred on March 28, 1979.
- s. Records of unit radiation and contamination surveys.
- t. Records of radiation exposure for all individuals entering radiation control areas.
- u. Records of gaseous and liquid radioactive material released to the environs.
- v. Records of reviews performed for changes made to the OFFSITE DOSE CALCULATION MANUAL.

6.11 RADIATION PROTECTION PROGRAM

Procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR Part 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

6.12 HIGH RADIATION AREA

In lieu of the "control device" or "alarm signal" required by Paragraph 20.203(c)(2) of 10 CFR 20, each high radiation area shall be controlled as specified in the Radiation Protection Plan.

6.13 OFFSITE DOSE CALCULATION MANUAL (ODCM)

Changes to the ODCM:

- a. Shall be documented and records of reviews performed shall be retained as required by Specification 6.10.2 v. This documentation shall contain:
 - 1) Sufficient information to support the change together with the appropriate analyses or evaluations justifying the change(s) and
 - 2) A determination that the change will maintain the level of radioactive effluent control required by 10 CFR 20.106, 40 CFR Part 190, 10 CFR 50.36a, and Appendix I to 10 CFR Part 50 and not adversely impact the accuracy or reliability of effluent, dose, or setpoint calculations.
- b. Shall become effective after review and acceptance by GPU Nuclear management.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as a part of or concurrent with the Annual Radioactive Effluent Release Report for the period of the report in which any change to the ODCM was made. Each change shall be identified by markings in the margin of the affected pages, clearly indicating the area of the page that was changed, and shall indicate the date (e.g., month/year) the change was implemented.

THREE MILE ISLAND - UNIT 2

RECOVERY OPERATIONS PLAN

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SURVEILLANCE REQUIREMENTS

4.3 INSTRUMENTATION

4.3.1 NEUTRON MONITORING INSTRUMENTATION

4.3.1.1 Each intermediate and source range neutron monitoring instrumentation channel shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK, CHANNEL CALIBRATION and CHANNEL FUNCTIONAL TEST operations at the frequency shown in Table 4.3-1.

4.3.2 ENGINEERED SAFETY FEATURE ACTUATION SYSTEM INSTRUMENTATION

Deleted

4.3.3 MONITORING INSTRUMENTATION

METEOROLOGICAL INSTRUMENTATION

4.3.3.4 Each of the meteorological monitoring instrumentation channels shall be demonstrated OPERABLE by the performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-5.

ESSENTIAL PARAMETERS MONITORING INSTRUMENTATION

4.3.3.5 Each of the Essential Parameters Monitoring Instrumentation channels shall be demonstrated OPERABLE by performance of the CHANNEL CHECK and CHANNEL CALIBRATION operations at the frequencies shown in Table 4.3-7.

CHLORINE DETECTION SYSTEMS

4.3.3.7 Each chlorine detection system shall be demonstrated OPERABLE by performance of a CHANNEL CHECK at least once per 24 hours, and a CHANNEL FUNCTIONAL TEST at least once per 31 days. At least once per 18 months, the following inspections and maintenance shall be performed:

- a. Check constant head bottle level and refill as necessary,
- b. Clean the sensing cells,
- c. Check flow meter operation and clean or replace filters and air lines as necessary.
- d. Check air pump for proper operation, and
- e. Verify that the detector responds to HCL.

TABLE 4.3-3

RADIATION MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

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THREE MILE ISLAND - UNIT 2

TECHNICAL SPECIFICATIONS

APPENDIX B

THREE MILE ISLAND NUCLEAR STATION UNIT 2
ENVIRONMENTAL TECHNICAL SPECIFICATIONS

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1.0. DEFINITIONS

NPDES Permit: NPDES Permit is the National Pollutant Discharge Elimination System Permit No. PA0009920 issued by the Environmental Protection Agency to Metropolitan Edison Company. This permit authorized Metropolitan Edison Company to discharge from TMINS, controlled waste water into the waters of the Commonwealth of Pennsylvania.

2.0 LIMITING CONDITIONS FOR OPERATION

Deleted

3.0 ENVIRONMENTAL MONITORING

Deleted

5.3.2 AUDIT RESPONSIBILITY

Deleted

5.4 STATE AND FEDERAL PERMITS AND CERTIFICATES

Section 401 of PL 92-500, the Federal Water Pollution Control Act Amendment of 1972 requires any applicant for a Federal license or permit to conduct any activity which may result in any discharge into navigable waters to provide the licensing agency a certification from the State having jurisdiction that the discharge will comply with applicable provisions of Sections 301, 302, 306, and 307 of the FWPCA. Section 401 of PL 92-500 further requires that any certification provided under this section shall set forth any effluent limitations and other limitations, and monitoring requirements necessary to assure that any applicant for a Federal license or permit will comply with the applicable limitations. Certifications provided in accordance with Section 401 set forth conditions on the Federal license or permit for which the certification is provided. Accordingly, the licensee shall comply with the requirements set forth in the 401 certification dated November 9, 1977 or its currently applicable revision, issued to the licensee by the Pennsylvania Department of Environmental Resources, which requires, among other things, that the licensee comply with effluent limitations stipulated in NPDES permit PA-0009920, effective January 30, 1975. Subsequent revisions to the permits and/or certifications will be accommodated in accordance with the provisions of Subsection 5.7.2.

5.5 PROCEDURES

Deleted

5.6 STATION REPORTING REQUIREMENTS

5.6.1 ROUTINE REPORTS

Deleted

5.6.2 NONROUTINE REPORTS

A report shall be submitted in the event that an Exceptional Occurrence as specified in Section 4.6 occurs. Report shall be submitted under one of the report schedules described below.

5.6.2.a PROMPT REPORT

Those events specified as prompt report occurrences shall be reported within 24 hours by telephone, telegraph, or facsimile transmission to the NRC followed by a written report to the NRC within 30 days.

5.6.2.b THIRTY DAY EVENT

Nonroutine events not requiring a prompt report as described in Subsection 5.6.2.a, shall be reported to the NRC either within 30 days of their occurrence or within the time limit specified by the reporting requirement of the corresponding certification or permit issued pursuant to Sections 401 or 402 of PL 92-500, whichever time duration following the nonroutine event shall result in the earlier submittal.

5.6.2.c CONTENT OF NONROUTINE REPORTS

Written 30-day reports and, to the extent possible, the preliminary telephone, telegraph, or facsimile reports shall (a) describe, analyze, and evaluate the occurrence, including extent and magnitude of the impact, (b) describe the cause of the occurrence, and (c) indicate the corrective action (including any significant changes made in procedures) taken to preclude repetition of the occurrence and to prevent similar occurrences involving similar components or systems.

5.7 CHANGES IN ENVIRONMENTAL TECHNICAL SPECIFICATIONS AND PERMITS

5.7.1 CHANGE IN ENVIRONMENTAL TECHNICAL SPECIFICATIONS

Request for changes in environmental technical specifications shall be submitted to the NRC for review and authorization per 10 CFR 50.90. The request shall include an evaluation of the environmental impact of the proposed change and a supporting justification. Implementation of such requested changes in ETS shall not commence prior to incorporation by the NRC of the new specifications in the license.

5.7.2 CHANGES IN PERMITS AND CERTIFICATIONS

Changes or addition to required Federal, State, local, and regional authority permits and certificates for the protection of the environment that pertain to the requirements of these ETS shall be reported to the NRC within 30 days. In the event that the licensee initiates or becomes aware of a request for changes to any of the water quality requirements, limits or values stipulated in any certification or permit issued pursuant to Sections 401 and 402 of PL 92-500 which is also the subject of an ETS reporting requirement, NRC shall be notified concurrently with the authorizing agency. The notification to the NRC shall include an evaluation of the environmental impact of the revised requirement, limit or value being sought.

If, during NRC's review of the proposed change, it is determined that a potentially severe environmental impact could result from the change, that NRC will consult with the authorizing agency to determine the appropriate action to be taken.

5.8 RECORDS RETENTION

Records and logs relative to the following areas shall be made and retained throughout the term of the operating license. These records and logs shall be made available to NRC on request.

- a. Records and drawing changes detailing station and unit design changes made to system and equipment which could potentially affect the environment.
- b. Records of all data from environmental monitoring, surveillance and study activities required by these environmental technical specifications.

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