

I. LICENSE AMENDMENT AND TECHNICAL SPECIFICATION CHANGE REQUEST (TSCR) NO. 260 (TMI-1)

GPU Nuclear, Inc. requests that the following change be made to the existing TMI-1 License and Technical Specifications (TS):

A. License replacement pages: (i), (ii), 1, 2, 3, 4, 5, 6, 7

B. Technical Specifications replacement pages: 6-1, 6-3, 6-5, 6-8, 6-11, 6-23, 6-24, 6-25

II. REASON FOR CHANGE

The purpose of this license amendment and TSCR is to reflect the use of a single trade name of GPU Energy as recently registered by the Metropolitan Edison Company, Pennsylvania Electric Company and Jersey Central Power and Light Company, the owners of TMI-1 ("Owners"). In addition, the license amendment and TSCR reflect the recent change in the legal name of the operator of TMI-1 from GPU Nuclear Corporation to GPU Nuclear, Inc.

The license amendment and TSCR are necessary because on or about August 1, 1996 the Owners of TMI-1 registered to do business under the trade name of GPU Energy. Also on or about August 1, 1996, the legal name of the operator of TMI-1 was changed from GPU Nuclear Corporation to GPU Nuclear, Inc.

The name changes have been made in accordance with a series of name changes implemented by GPU, Inc.¹ to improve customer, employee and business recognition for the GPU family of companies.

It is important to note that the Owners of TMI-1 continue to exist and maintain their legal names. Owner-related correspondence submitted to the NRC on the docket will reference both the Owner's legal names and the common trade name. GPU Energy is not a separate entity; it is the registered common trade name that is being used to reflect the unity of focus and purpose.

¹ GPU, Inc. (formerly known as General Public Utilities Corporation) is the holding company that owns 100% of stock of the Metropolitan Edison Company, Pennsylvania Electric Company and Jersey Central Power and Light Company.

III. SAFETY EVALUATION JUSTIFYING CHANGE TO TMI-1 LICENSE AND TECHNICAL SPECIFICATIONS

The proposed changes to the license for TMI-1 that reflect the trade name of the Owners, and that reflect the change in the legal name of the operator, have no impact on the continued safe operation of the TMI-1 nuclear power plant. The corporate existence of all three Owners and the operator of TMI-1 continues uninterrupted, and all legal characteristics remain the same. The name changes do not alter the state of incorporation, registered agent, registered office, directors, officers, rights or liabilities of the Owners of TMI-1 or the operator of TMI-1. Similarly, the name changes do not alter the function of either the Owners or the operator of TMI-1, or in the way they do business. The Owner's financial responsibility for TMI-1 and their sources of funds to support the facility remain the same. These name changes do not impact the existing ownership of TMI-1 and do not alter any of the existing licensing conditions applicable to TMI-1. There is no change to GPU Nuclear, Inc.'s ability to comply with these licensing conditions or with any other obligation or responsibility under the license. Specifically, the Owners of TMI-1 remain regulated electric utilities. The funds accrued by the Owners continue to be available to fulfill all obligations related to TMI-1 as they were before the name changes.

There will be no impact on the safe operation of TMI-1 as a result of the name changes. Access to funds necessary to safely operate TMI-1 to the end of license is unaffected. Access to decommissioning trust funds to ensure that TMI-1 can be decommissioned in accordance with NRC regulations remains as it was prior to the name changes.

IV. NO SIGNIFICANT HAZARDS CONSIDERATION ANALYSIS

GPU Nuclear, Inc. has determined that the proposed TMI-1 license amendment and technical specification change request involve no significant hazards consideration as defined in 10 CFR 50.92 because:

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 adds to the license and the technical specifications the trade name of the Owners of TMI-1. The change in the legal name of the operator of TMI-1 is a cosmetic change made to reflect the name changes made throughout the GPU family of companies. The name change has no impact on plant design or operation.

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 because no new failure modes are created by the proposed changes. The use of a common trade name for the Owners of TMI-1 and the change in the legal name of the operator of TMI-1 has no impact on plant design or operation. Thus, there is no creation of the possibility of a new or different kind of accident from those previously evaluated.

Operation of the facility in accordance with the proposed amendment will not involve a significant reduction in a margin of safety. The proposed amendment does not change any operating limits for reactor operation.

V. IMPLEMENTATION

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

Enclosure 2

Revised Pages of the TMI-1 Amended License

METROPOLITAN EDISON COMPANY,
JERSEY CENTRAL POWER & LIGHT COMPANY AND
PENNSYLVANIA ELECTRIC COMPANY d/b/a
GPU ENERGY; and
GPU NUCLEAR, INC.
DOCKET NO. 50-289
THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 1
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No.
License No. DPR-50

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by GPU Nuclear, Inc., et al. (the licensee), dated December 16, 1996, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. Accordingly, the license is amended by changes to the license and Technical Specifications as indicated in the attachment to this license amendment, and paragraph 2.c.(2) of Facility Operating License No. DPR-50 is hereby amended to read as follows:

- (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. , are hereby incorporated in the license. GPU Nuclear, Inc. shall operate the facility in accordance with the Technical Specifications.

3. This license amendment is effective as of its date of issuance, to be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Attachment: Changes to the license and Technical
Specifications

Date of Issuance:

METROPOLITAN EDISON COMPANY,
JERSEY CENTRAL POWER AND LIGHT COMPANY AND
PENNSYLVANIA ELECTRIC COMPANY d/b/a
GPU ENERGY ; and
GPU NUCLEAR, INC.
(Three Mile Island Nuclear Station, Unit 1)
DOCKET NO. 50-289
FACILITY OPERATING LICENSE

Amendment No.
License No. DPR-50

1. The Atomic Energy Commission (the Commission) having found that:
 - a. The application for license filed by the Metropolitan Edison Company, Jersey Central Power and Light Company, the Pennsylvania Electric Company d/b/a GPU Energy (the Owners) complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter 1 and all required notifications to other agencies or bodies have been duly made;
 - b. Construction of the Three Mile Island Nuclear Station, Unit 1 (the facility) has been substantially completed in conformity with Construction Permit No. CPPR-40, the application, as amended, the provisions of the Act and the rules and regulations of the Commission;
 - c. The facility will operate in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission;
 - d. There is reasonable assurance: (1) that the activities authorized by this operating license can be conducted without endangering the health and safety of the public, and (2) that such activities will be conducted in compliance with the rules and regulations of the Commission;
 - e. GPU Nuclear, Inc. is technically qualified and the Owners are financially qualified to engage in the activities authorized by this operating license in accordance with the rules and regulations of the Commission;

- f. The Owners have satisfied the applicable provisions of 10 CFR Part 140, "Financial Protection Requirements and Indemnity Agreements," of the Commission's regulations;
 - g. The issuance of this operating license will not be inimical to the common defense and security or to the health and safety of the public;
 - h. After weighing the environmental, economic, technical, and other benefits of the facility against environmental costs and considering available alternatives, the issuance of Facility Operating License No. DPR-50 is in accordance with 10 CFR Part 50, Appendix D, of the Commission's regulations and all applicable requirements of said Appendix D have been satisfied; and
 - i. The receipt, possession, and use of source, byproduct and special nuclear material as authorized by this license will be in accordance with the Commission's regulations in 10 CFR Parts 30, 40 and 70, including 10 CFR Section 30.33, 40.32, 70.23 and 70.31.
2. Facility Operating License No. DPR-50 is hereby issued to the Metropolitan Edison Company, Jersey Central Power and Light Company, Pennsylvania Electric Company d/b/a GPU Energy and GPU Nuclear, Inc. to read as follows:
- a. This license applies to the Three Mile Island Nuclear Station, Unit 1, a pressurized water reactor and associated equipment (the facility), owned by the Metropolitan Edison Company, Jersey Central Power and Light Company, Pennsylvania Electric Company d/b/a GPU Energy and operated by GPU Nuclear, Inc.. The facility is located in Dauphin County, Pennsylvania, and is described in the "Final Safety Analysis Report" as supplemented and amended (Amendments 1 through 47) and the Environmental Report as supplemented and amended (Amendments 1 and 2).
 - b. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:
 - (1) GPU Nuclear, Inc., pursuant to Section 104b of the Act and 10 CFR Part 50, "Licensing of Production and Utilization Facilities," to possess, use, and operate the facility; and Metropolitan Edison Company, Jersey Central Power and Light Company, Pennsylvania Electric Company d/b/a GPU Energy to possess the facility in accordance with the procedures and limitations set forth in this license;

- (2) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess and use at any time any byproduct, source and special nuclear material as reactor fuel, sealed neutron sources for reactor startup, sealed sources for reactor instrumentation and radiation monitoring equipment calibration, and as fission detectors in amounts as required for reactor operation;
 - (3) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30, 40 and 70 to receive, possess and use in amounts as required any byproduct, source or special nuclear material without restriction to chemical or physical form, for sample analysis, testing, instrument calibration, or associated with radioactive apparatus or components;
 - (4) GPU Nuclear, Inc., pursuant to the Act and 10 CFR Parts 30 and 70, to possess, but not separate, such byproduct and special nuclear materials as may be produced by the operation of the facility.
- c. This license shall be deemed to contain and is subject to the conditions specified in the following Commission regulations 10 CFR Chapter I: Part 20, Section 30.34 of Part 30, Section 40.41 of Part 40, Section 50.54 and 50.59 of Part 50, and Section 70.32 of Part 70; is subject to all applicable provisions of the Act and to the rules, regulations, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:
- (1) Maximum Power Level

GPU Nuclear, Inc. is authorized to operate the facility at steady state reactor core power levels not in excess of 2568 megawatts thermal.
 - (2) Technical Specifications

The Technical Specifications contained in Appendix A, as revised through Amendment No. are hereby incorporated in the license. GPU Nuclear, Inc. shall operate the facility in accordance with the Technical Specifications.

(3) Physical Protection

The license shall fully implement and maintain in effect all provisions of the Commission-approved physical security, guard training and qualification, and safeguards contingency plans including amendments made pursuant to provisions of the Miscellaneous Amendments and Search Requirements revisions to 10 CFR 73.55 (51 FR 27817 and 27822) and to the authority of 10 CFR 50.90 and 10 CFR 50.54(p). The plans, which contain safeguards information protected under 10 CFR 73.21, are entitled: "Three Mile Island, Units 1 and 2, Modified Amended Physical Security Plan," with revisions submitted through July 8, 1988; "Three Mile Island, Units 1 and 2, Security Personnel Training and Qualification Plan," with revisions submitted through November 28, 1986; and "Three Mile Island, Units 1 and 2, Safeguards Contingency Plan," with revision submitted through June 20, 1986. Changes made in accordance with 10 CFR 73.55 shall be implemented in accordance with the schedule set forth therein.

(4) Fire Protection

GPU Nuclear, Inc. shall implement and maintain in effect all provisions of the Fire Protection Program as described in the Updated FSAR for TMI-1.

Changes may be made to the Fire Protection Program without prior approval by the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided that interim compensatory measures are implemented.

- (5) The licensee shall implement a secondary water chemistry monitoring program to inhibit steam generator tube degradation. This program shall include:
- a. Identification of a sampling schedule for the critical parameters and control points for these parameters;
 - b. Identification of the procedures used to measure the values of the critical parameters;

- c. Identification of process sampling points;
- d. Procedure for the recording and management of data;
- e. Procedures defining corrective actions of off control point chemistry conditions;
and
- f. A procedure identifying (1) the authority responsible for the interpretation of the data, and (2) the sequence and timing of administrative events required to initiate corrective action.

(6) Inservice Testing - DELETED

(7) Aircraft Movements

Sixty (60) days following the report on aircraft movements at the Harrisburg International Airport for the calendar year 1984 pursuant to Technical Specification 6.9.1.B.2.b, a report shall be submitted updating the aircraft probability analysis presented by Metropolitan Edison Company to the Atomic Safety and Licensing Appeal Board in the Three Mile Island, Unit No. 2 operation license proceeding (Docket No. 50-320). Such report shall utilize current data on aircraft movements at the Harrisburg International Airport and updated national aerial crash rates and shall be based on the same methodology presented by Metropolitan Edison Company as accepted by the Appeal Board in ALAB-692. Following receipt of such report NRC will, after discussion with GPU Nuclear, Inc., determine the need for further periodic aircraft probability analyses.

(8) Repaired Steam Generators

In order to confirm the leak-tight integrity of the Reactor Coolant System, including the steam generators, operation of the facility shall be in accordance with the following:

1. Prior to initial criticality, GPU Nuclear, Inc. shall submit to NRC the results of the steam generator hot test program and a summary of its management review.
2. GPU Nuclear, Inc. shall confirm baseline primary-to-secondary leakage rate established during the steam generator hot test program. If leakage exceeds the baseline leakage rate by more than 0.1 gpm*, the facility shall be shut down and leak tested. If any increased leakage above baseline is due to defects in the tube free span, the leaking tube(s) shall be removed from service. The baseline leakage shall be re-established, provided that the leakage limit of Technical Specification 3.1.6.3 is not exceeded.
3. GPU Nuclear, Inc. shall complete its post-critical test program at each power range (0-5%, 5%-50%, 50%-100%) in conformance with the program described in Topical Report 008, Rev. 3, and shall have available the results of that test program and a summary of its management review, prior to ascension from each power range and prior to normal power operation.
4. GPU Nuclear, Inc. shall conduct eddy-current examinations, consistent with the extended inservice inspection plan defined in Table 3.3-1 of NUREG-1019, either 90 calendar days after reaching full power, or 120 calendar days after exceeding 50% power operation, whichever comes first. In the event of plant operation for an extended period at less than 50% power, GPU Nuclear, Inc. shall provide an assessment at the end of 180 days of operation at power levels between 5% and 50%, such assessment to contain recommendations and supporting information as to the necessity of a special eddy-current testing (ECT) shutdown before the end of the refueling cycle. (The NRC staff will evaluate that assessment and determine the time of the next eddy-current examination, consistent with the other provisions of the license conditions.) In the absence of such an assessment, a special ECT shutdown shall take place before an additional 30 days of operation at power above 5%.

*If leakage exceeds the baseline leakage rate by more than 0.2 gpm during the remainder of the Cycle 8 operation, the facility shall be shutdown and leak tested. Operation at leakage rates of up to 0.2 gpm above the baseline leakage rate shall be acceptable during the remainder of Cycle 8 operation. After the 9R refueling outage, the leakage limit and accompanying shutdown requirements revert to 0.2 gpm above the baseline leakage rate.

5. GPU Nuclear, Inc. shall provide routine reporting of the long-term corrosion "lead tests" test results on a quarterly basis as well as more timely notification if adverse corrosion test results are discovered.

(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 November 28, 1994.
- 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.

This license is effective as of the date of issuance and shall expire at midnight, April 19, 2014.

FOR THE ATOMIC ENERGY COMMISSION

Original Signed by A. Giambusso

A. Giambusso, Deputy Director
for Reactor Projects
Directorate of Licensing

Attachment: Appendix A Technical
Specifications

Date of Issuance: April 19, 1974

Enclosure 3

Revised Pages of TMI-1 Technical Specifications

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The Vice President - TMI shall be responsible for TMI-1 and TMI-2 operations and may, at any time, delegate his responsibilities in writing to the Director, Operations and Maintenance, TMI. He shall delegate the succession of his responsibilities in writing during his absence.
- 6.1.2 The Shift Supervisor (or during his absence from the Control Room, a designated individual), shall be responsible for the Control Room command function. A management directive to this effect signed by the President - GPU Nuclear, Inc. shall be reissued to all unit personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 CORPORATE

- 6.2.1.1 An onsite and offsite organization shall be established for unit operation and corporate management. The onsite and offsite organization shall include the positions for activities affecting the safety of the nuclear power plant.
- 6.2.1.2 Lines of authority, responsibility and communication shall be established and defined from the highest management levels through intermediate levels to and including operating organization positions. These relationships shall be documented and updated as appropriate, in the form of organizational charts. These organizational charts will be documented in the Updated FSAR and updated in accordance with 10 CFR 50.71e.
- 6.2.1.3 The President-GPU Nuclear, Inc. shall have corporate responsibility for overall plant nuclear safety and shall take measures to ensure acceptable performance of the staff in operating, maintaining, and providing technical support so that continued nuclear safety is assured.

6.2.2 UNIT STAFF

- 6.2.2.1 The Vice President-TMI shall be responsible for overall unit safe operation and shall have control over those on site activities necessary for safe operation and maintenance of the site.
- 6.2.2.2 The unit staff organization shall meet the following:
 - a. Each on-duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2-1.
 - b. At least one licensed Reactor Operator shall be present in the control room when fuel is in the reactor.

6.3 UNIT STAFF QUALIFICATIONS

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI/ANS 3.1 of 1978 for comparable positions unless otherwise noted in the Technical Specifications. Licensed operators shall also meet the requirements of 10 CFR Part 55. Individuals who do not meet ANSI/ANS 3.1 of 1978, Section 4.5, are not considered technicians or maintenance personnel for purposes of determining qualifications but are permitted to perform work for which qualification has been demonstrated.
- 6.3.2 The management position responsible for radiological controls shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each radiological controls technician/supervisor shall meet or exceed the qualifications of ANSI-N 18.1-1971, paragraph 4.5.2/4.3.2, or be formally qualified through an NRC approved TMI-I Radiation Controls training program. All radiological controls technicians will be qualified through training and examination in each area or specific task related to their radiological controls functions prior to their performance of those tasks.
- 6.3.3 The Shift Technical Advisors shall have a bachelor's degree or equivalent in a scientific or engineering discipline with specific training in unit design, response and analysis of transients and accidents.

6.4 TRAINING

- 6.4.1 A retraining and replacement training program for the unit staff shall be maintained under the direction of the plant training manager and shall meet or exceed the requirements and recommendations of Regulatory Guide 1.8 of 1977. Licensed operator training shall also meet the requirements of 10 CFR Part 55.
- 6.4.2 A training program for the Fire Brigade shall be maintained and shall meet or exceed the requirements of Section 27 of the NFPA Code - 1976.

6.5 REVIEW AND AUDIT

6.5.1 TECHNICAL REVIEW AND CONTROL

The Vice President of each division within GPU Nuclear, Inc. shall be responsible for ensuring the preparation, review, and approval of documents required by the activities described in 6.5.1.1 through 6.5.1.5 within his functional area of responsibility as assigned in the GPU Nuclear, Inc. Review and Approval Matrix. Implementing approvals shall be performed at the cognizant manager level or above.

- 6.5.1.9 The Emergency Plan and implementing procedures shall be reviewed by a knowledgeable individual(s)/group other than the individual(s)/group which prepared them.
- 6.5.1.10 A knowledgeable individual(s)/group shall review every unplanned onsite release of radioactive material to the environs including the preparation and forwarding of reports to the Vice President TMI covering evaluations, recommendations and disposition of the corrective action to prevent recurrence.
- 6.5.1.11 Major changes to radwaste systems shall be reviewed by a knowledgeable individual(s)/group other than the individuals(s)/group which prepared them.
- 6.5.1.12 Individuals responsible for reviews performed in accordance with 6.5.1.1 through 6.5.1.4 shall include a determination of whether or not additional cross-disciplinary review is necessary. If deemed necessary, such review shall be performed by the appropriate personnel. Individuals responsible for reviews considered under 6.5.1.1, 6.5.1.3, and 6.5.1.4 shall render determinations in writing with regard to whether or not 6.5.1.1, 6.5.1.3, and 6.5.1.4 constitute an unreviewed safety question.

RECORDS

- 6.5.1.13 Written records of activities performed under Specifications 6.5.1.1 through 6.5.1.11 shall be maintained.

QUALIFICATIONS

- 6.5.1.14 Responsible Technical Reviewers shall meet or exceed the qualifications of ANSI/ANS 3.1 of 1978 Section 4.6, or 4.4 for applicable disciplines, or have 7 years of appropriate experience in the field of his specialty. Credit toward experience will be given for advanced degrees on a one-to-one basis up to a maximum of two years. Responsible Technical Reviewers shall be designated in writing.

6.5.2 INDEPENDENT SAFETY REVIEW FUNCTION

- 6.5.2.1 The Vice President of each division within GPU Nuclear, Inc. shall be responsible for ensuring the independent safety review of the subjects described in 6.5.2.5 within his assigned area of safety review responsibility, as assigned in the GPU Nuclear, Inc. Review and Approval Matrix.
- 6.5.2.2 Independent safety review shall be completed by an individual/group not having direct responsibility for the performance of the activities under review, but who may be from the same functionally cognizant organization as the individual/group performing the original work.
- 6.5.2.3 GPU Nuclear, Inc. shall collectively have or have access to the experience and competence required to independently review subjects in the following areas:

- i. The Process Control Program and implementing procedures for solidification of radioactive wastes.
- j. The performance of activities required by the Quality Assurance Program to meet criteria of Regulatory Guide 4.15, December, 1977.
- k. Any other area of unit operation considered appropriate by the IOSRG or the Office of the President - GPU Nuclear, Inc.

6.5.3.2 Audits of the following shall be performed under the cognizance of the vice president responsible for technical support:

- a. An independent fire protection and loss prevention program inspection and audit shall be performed utilizing either qualified licensee personnel or an outside fire protection firm.
- b. An inspection and audit of the fire protection and loss prevention program, by an outside qualified fire consultant.

RECORDS

6.5.3.3 Audit reports encompassed by sections 6.5.3.1 and 6.5.3.2 shall be forwarded for action to the management positions responsible for the areas audited within 60 days after completion of the audit. Upper management shall be informed per the Operation Quality Assurance Plan.

6.5.4 INDEPENDENT ONSITE SAFETY REVIEW GROUP (IOSRG) STRUCTURE

6.5.4.1 The IOSRG shall be a full-time group of engineers, experienced in nuclear power plant engineering, operations and/or technology, independent of the unit staff, and located on site.

ORGANIZATION

- 6.5.4.2
 - a. The IOSRG shall consist of a manager and a minimum staff of 3 members who meet the qualifications of 6.5.4.5. Group expertise shall be multi-disciplined.
 - b. In the event of an unanticipated vacancy in the IOSRG staff, the number of staff can be two (2) members for a period of not to exceed six (6) months while the vacancy is being filled.
 - c. The IOSRG shall report to the director responsible for nuclear safety assessment.

6.8 PROCEDURES AND PROGRAMS

- 6.8.1 Written procedures shall be established, implemented and maintained covering the items referenced below:
- a. The applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.
 - b. Surveillance and test activities of equipment that affects nuclear safety and radioactive waste management equipment.
 - c. Refueling Operations.
 - d. Security Plan Implementation.
 - e. Fire Protection Program Implementation.
 - f. Emergency Plan Implementation.
 - g. Process Control Program Implementation.
 - h. Offsite Dose Calculation Manual Implementation.
 - i. Quality Assurance Program for effluent and environmental monitoring using the guidance in Regulatory Guide 4.15, Revision 1.
 - j. Plant Staff Overtime, to limit the amount worked by staff performing safety-related functions in accordance with NRC Policy Statement on working hours (Generic Letter No. 82-12).
- 6.8.2 Further, each procedure required by 6.8.1 above, and substantive changes thereto, shall be reviewed and approved as described in 6.5.1 prior to implementation and shall be reviewed periodically as set forth in administrative procedures.
- 6.8.3 Temporary changes to procedures of 6.8.1 above may be made provided:
- a. The intent of the original procedure is not altered;
 - b. The change is approved by two members of GPU Nuclear, Inc. Management Staff qualified in accordance with 6.5.1.14 and knowledgeable in the area affected by the procedure. For changes which may affect the operational status of unit systems or equipment, at least one of these individuals shall be a member of unit management or supervision holding a Senior Reactor Operator's License on the unit.
 - c. The change is documented, reviewed and approved as described in 6.5.1 within 14 days of implementation.

6.13 PROCESS CONTROL PROGRAM (PCP)

6.13.1 GPU Nuclear, Inc. initiated changes to the PCP:

1. Shall be submitted to the NRC in the Annual Radioactive Effluent Release Report for the period in which the changes were made. This submittal shall contain:
 - a. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
 - b. a determination that the changes did not reduce the overall conformance of the solidified waste product to existing criteria for solid wastes; and,
 - c. documentation that the changes have been reviewed and approved pursuant to 6.8.2.
2. Shall become effective upon review and approval by GPU Nuclear, Inc. Management.

6.14 OFFSITE DOSE CALCULATION MANUAL (ODCM)

6.14.1 GPU Nuclear, Inc. initiated changes to the ODCM:

1. Shall be submitted to the NRC in the Annual Radioactive Effluent Release Report for the period in which the changes were made.
This submittal shall contain:
 - a. sufficiently detailed information to justify the changes without benefit of additional or supplemental information;
 - b. a determination that the changes did not reduce the accuracy or reliability of dose calculations or setpoint determinations; and
 - c. documentation that the changes have been reviewed and approved pursuant to 6.8.2.
2. Shall become effective upon review and approval by GPU Nuclear, Inc. Management.

6.15 DELETED

6.16 POST-ACCIDENT SAMPLING PROGRAMS NUREG 0737 (ILB.3, ILF.1.2)

Program which will ensure the capability to accurately sample and analyze vital areas under accident conditions have been implemented.

The following programs have been established:

1. Iodine and Particulate Sampling
2. Reactor Coolant System
3. Containment Atmosphere Sampling

Each program shall be maintained and shall include the following:

1. Training of personnel,
2. Procedures, and
3. Provisions for maintenance of sampling and analysis equipment.

6.17 MAJOR CHANGES TO RADIOACTIVE WASTE TREATMENT SYSTEMS

6.17.1 GPU Nuclear, Inc. initiated safety related changes to the radioactive waste system (liquid, gaseous and solid):

1. Shall be reported to the Commission in the Annual Report (Specification 6.9.1B) for the period in which the evaluation was reviewed. The discussion of each change shall contain:
 - a. A summary of the evaluation that led to the determination that the change could be made in accordance with 10 CFR 50.59;
 - b. Sufficient detailed information to totally support the reason for the change without benefit of additional or supplemental information;
 - c. A detailed description of the equipment, components and processes involved and the interfaces with other plant systems;
 - d. An evaluation of the change which shows the predicted releases of radioactive materials in liquid and gaseous effluents and/or quantity of solid waste that differ from those previously predicted in the license application and amendments thereto;
 - e. An evaluation of the change which shows the expected maximum exposures to individuals in the unrestricted area and to the general population that differ from those previously estimated in the license application and amendments thereto;
 - f. A comparison of the predicted releases of radioactive materials, in liquid and gaseous effluents and in solid waste, to the actual releases for the period prior to when the changes are to be made;
 - g. An estimate of the exposure to plant operating personnel as a result of the change; and
 - h. Documentation of the fact that the change was reviewed and approved.
2. Shall become effective upon review and approval in accordance with Section 6.5.1.

Enclosure 4

Certificate of Service for Technical Specification Change Request 260