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September 11, 1985

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UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of )  
 )  
METROPOLITAN EDISON COMPANY, ) Docket No. 50-320 OLA  
 et al. )  
 )  
(Three Mile Island Nuclear )  
 Station, Unit No. 2) )

LICENSEE'S RESPONSE TO STAFF'S MOTION  
TO CONFORM PROPOSED TECHNICAL SPECIFICATIONS  
IN ACCORDANCE WITH AUGUST 8, 1985 AMENDMENT OF ORDER

By Order of the Director, Office of Nuclear Reactor Regulation, dated February 11, 1980, the Commission established a set of formal license requirements reflecting the post-accident condition of the TMI-2 facility and assuring the continued maintenance of the current safe, stable, long-term cooling condition of the facility. The February 11 Order further provided that the requirements of the proposed Technical Specifications (attached to the Order) were immediately effective, with an opportunity for hearing prior to the effectiveness of the proposed formal license amendment. At the time the February 11 Order was issued, both the Staff and Licensee anticipated that, during the pendency of this matter, changes in the proposed Technical Specifications might be necessary as the facility status evolves as a result of ongoing recovery efforts.

On August 8, 1985, the Director of the NRC Office of Nuclear Reactor Regulation issued an "Amendment of Order,"<sup>1/</sup> revising the Proposed Technical Specifications (1) to modify existing limiting conditions for operation to more correctly reflect the systems and equipment necessary based on the present status of TMI-2, (2) to add new limiting conditions for operation to more correctly state the systems and equipment necessary based on the present status of TMI-2, and (3) to modify the bases to appropriately reflect corresponding changes in limiting conditions for operation.

By the August 28, 1985 "NRC Staff Notice of Issuance of Amendment of Order and Motion to Conform Proposed Technical Specifications In Accordance Therewith," the Staff has moved that the proposed Technical Specifications attached to the February 11, 1980 Order be formally modified in accordance with the August 8, 1985 "Amendment of Order," subject to the authority which 10 C.F.R. §2.717(b) reserves to the presiding officer in this proceeding.

As Licensee understands the Staff's motion, it is simply a request by the Staff that the Board issue an order notifying

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<sup>1/</sup> Concurrently issued on August 8, 1985 were (1) an exemption from the requirements of 10 C.F.R. 50, Appendix A, General Design Criteria 34 with respect to the residual heat removal system, and (2) an exemption from the requirements of 10 C.F.R. 50, Appendix A, General Design Criteria 37 with respect to the testing of the emergency core cooling system.

all parties that the proposed Technical Specifications under consideration in the prospective hearing requested in this proceeding are revised in accordance with the August 8, 1985 "Amendment of Order." The formal license amendment incorporating the proposed Technical Specifications, as amended, would await the outcome of the prospective hearing. With this understanding, Licensee does not oppose the motion.

Respectfully submitted,

SHAW, PITTMAN, POTTS & TROWBRIDGE

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Dated: September 11, 1985

September 11, 1985

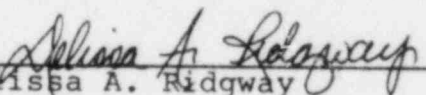
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CERTIFICATE OF SERVICE

I hereby certify that copies of "Licensee's Response To Staff's Motion To Conform Proposed Technical Specifications In Accordance With August 8, 1985 Amendment of Order" were served this 11th day of September, 1985, by deposit in the U.S. mail, first class, postage prepaid, upon the parties listed on the attached Service List.

  
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Delissa A. Ridgway

Dated: September 11, 1985

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