

# AmerGen

A PECO Energy/British Energy Company

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January 20, 2000

5928-00-20008

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

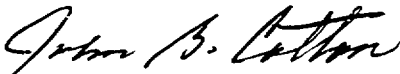
Gentlemen:

Subject: Three Mile Island Unit 1, (TMI Unit 1)  
Operating License No. DPR-50  
Docket No. 50-289 and,  
Revisions to the TMI Modified Amended Physical Security, Contingency and the  
Training and Qualification Plans

The purpose of this letter is to submit, pursuant to the provisions of 10 CFR 50.4(b)(4), Revision 40 of the Modified Amended Physical Security Plan, Revision 11 of the Contingency Plan and Revision 17 of the Training and Qualification Plan for Three Mile Island. The revisions to the subject plan became effective on December 20, 1999.

Please insert the attached revised pages into the previous copies of the appropriate plan. Three additional copies of this letter and attachments are also enclosed. The changes incorporated in the revisions to the plans do not decrease the effectiveness of the plans and have been implemented in accordance with 10 CFR 50.54(p). A summary of the changes for each plan is contained in Attachment 1.

Sincerely,



John B. Cotton  
Vice President, TMI Unit 1

WGH

Attachment 1

cc: Administrator, Region I- Hubert J. Miller (2 copies)  
TMI-1 Senior Project Manager- Timothy G. Colburn (w/o att)  
TMI Senior Resident Inspector- Wayne L. Schmidt (w/o att)  
Safeguards & Emergency Preparedness- Gregory C. Smith (w/att's)  
File 00028

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## Change Summary

### TMI MODIFIED AMENDED PHYSICAL SECURITY PLAN

REV 40

The changes made to the TMI Modified Amended Physical Security Plan, Rev 40, do not represent any decrease in effectiveness. The change reflects a change in organizational structure due to the sale of Three Mile Island by GPU Nuclear to AmerGen, other changes that reflect the sale and a different exhibit map that more accurately reflects the plant building configuration. The changes affected the pagination of the plan and therefore, for clarity, the entire plan is listed as Revision 40. All actual changes are described below.

01. Specific Change

Page 1.0, the logo has been changed and the affected job titles are changed in the sign offs.

Reason for Change

The change is due to sale of TMI to AmerGen and the associated change in corporate structuring.

Justification

The change is made to accurately reflect the new corporate structuring and the new company.

02. Specific Change

Page 8.0, para 4.1, the job titles for the reporting structure have been changed to reflect the changes initiated by the sale of TMI to AmerGen. The TMI Unit 1 Chief Nuclear Officer has overall responsibility for security at TMI, changed from the Office of the President. The reporting structure will be from top down; TMI Unit 1 Chief Nuclear Officer, VP/TMI Unit 1, Manager, Human Resources, Site Security Manager.

Reason for Change

The change is due to sale of TMI to AmerGen and the associated change in corporate structuring.

Justification

The change is made to accurately reflect the new corporate structuring.

03. Specific Change

Page 8.0, para 4.2, the deletion of references to a possible restart of TMI Unit 2.

Reason for Change

AmerGen is purchasing TMI Unit 1. Unit 2 will remain the property of GPU Nuclear.

Justification

There are no plans to restart TMI Unit 2. Though most of Unit 2 has been dismantled AmerGen Security will continue to patrol the protected area that includes Unit 2. This issue has been previously discussed with Greg Smith, USNRC Region I.

04. Specific Change

Page 10.0, para 4.3.1 (g), change GPU System to AmerGen.  
Page 13.0, para 4.6.1, change GPU Nuclear to AmerGen.

Reason for Change

The change is made due to the sale of TMI to AmerGen.

Justification

The change is to accurately reflect the new company name.

05. Specific Change

Page 21.0, para 4.8.11, change Human Resources CICO Representative to Human Resources Access Center.

Reason for Change

The change is administrative in nature.

Justification

The CICO system is not year 2000 compatible, therefore there will be no CICO Representative. The Human Resources Department issues photo-ident badges.

06. Specific Change

Page 22.0, para 4.8.12, change deletes GPU in describing the external network phone system.

Reason for Change

The change is made due to the sale of TMI to AmerGen.

Justification

The GPU system will no longer be used for normal external phone usage. This function will be through the AmerGen system to the outside phone company system. The tie line system from TMI through GPU will continue to function per a sale agreement to allow for proper transition.

07. Specific Change

Page 36.0, para 4.11.5.3, changes VP – Director of TMI to VP/TMI Unit 1.

Reason for Change

The changes reflects the change in corporate structure due to the sale of TMI to AmerGen.

Justification

The change continues to assign the responsibility to approve personnel authorized to grant unescorted access to the senior on-site company officer.

08. Specific Change

Page 37.0, para 4.12.1. references to the microwave telephone link are deleted.  
Page 38.0, para 4.12.3 (c), " "  
Page 40.0, para 4.17.5 (b), " "  
Page 53, Exhibit 4.1, " "

Reason for Change

The telephone link previously listed as microwave/fiber has been replaced with all fiber optics. The microwave functions as a link from GPUE Dispatch Center to monitor functions in the 230 KV substation.

Justification

The phone link via total fiber optics is an enhancement.

09. Specific Change

Page 40.0, para 4.17.5 (b), change intra-company to inter-company.

Reason for Change

Change is due to sale of TMI to AmerGen.

Justification

The change reflects the sale to AmerGen. The tie line will continue to function from TMI through the GPU system due to the sale agreement to allow for proper transition.

10. Specific Change

Page 46.0, Exhibit 1.1, changes the job titles in the Security reporting chain.

Reason for Change

See Specific Change number 02, above.

Justification

See Specific Change number 02, above.

11. Specific Change

Page 49.0, Exhibit 2.2, changes the Site Map.

Reason for Change

The layout of site facilities and buildings has changed since the old map was placed in the plan.

Justification

The change will more accurately reflect the configuration of facilities and buildings on the TMI site.

CONTINGENCY PLAN FOR TMI

REV 11

The changes made to the Contingency Plan for TMI, Rev 11, do not represent any decrease in effectiveness. The changes as described in the following documentation encompass; the change in the security organization and approval signatures due to the sale of TMI by GPUN to AmerGen, the associated title changes, a change in the designation of the Explosive Ordnance Disposal Unit and correction of spelling errors. Additionally, the word processing program was changed from "WordPerfect" to "Microsoft Word" which caused a change in the pagination of the document therefore the entire document is considered a revision.

01. Specific Change:

Page 1.0, change logo from GPUN to AmerGen, associated document number is changed, and personnel titles to reflect new reporting structure are changed.

Reason for Change

Change is made due to the sale of Three Mile Island by GPU Nuclear to AmerGen.

Justification

The change is solely due to the sale of TMI and does not reflect any changes in the conduct of security functions.

02. Specific Change:

Page 6.0, para 3.1, change "TMI Vice President/Director" to "VP/TMI Unit 1".

Page 8.0, para 4.1,	"	"
Page 8.0, para 4.2.1,	"	"
Page 9.0, para 4.2.4,	"	"
Page 14.0, para 4.5.1.2,	"	"
Page 16.0, para 4.5.3,	"	"
Page 20.0, para 4.5.4.4.2,	"	"
Page 32.0, Table 4.6.1,	"	"
Page 34.0, Table 4.6.2,	"	"
Page 35.0, Table 4.6.3,	"	"
Page 39.0, Table 4.6.4.4,	"	"
Page 40.0, Table 4.6.5.1,	"	"
Page 44.0, Table 4.6.6.2,	"	"
Page 46.0, Table 4.6.6.4,	"	"
Page 49.0, Table 4.6.7,	"	"
Page 50.0, Table 4.6.8,	"	"
Page 51.0, Table 4.6.9,	"	"
Page 52.0, Table 4.6.10,	"	"

Reason for Change

The change is a change in job title due to the restructuring in the corporate organization as a result of the sale of TMI to AmerGen. The VP/TMI Unit 1 will be the senior on-site AmerGen management person.

Justification

The change is solely due to the restructuring of personnel and continues to assign responsibilities to the senior on-site person. This change reflects no decrease in the effectiveness of the security program.

03 Specific Change

Page 11.0, para 4.2.15, addition of the word "Police".

Reason for Change

The word Police is added to complete the title Pennsylvania State Police.

Justification

The change is to correct an omission from previous revisions of this plan.

04 Specific Change

Page 11.0, para 4.2.17.1, deletion of the word "system" and addition of "GPUE".

Reason for Change

With the sale of TMI to AmerGen, TMI will no longer be part of the GPU "system". GPUE is added to show that this communications function will be handled via the GPU Energy dispatcher per a pre-sale agreement between GPU and AmerGen.

Justification

The change is made to reflect the actual links of this communications functions and reflects no decrease in the effectiveness of the security program.

05 Specific Change

Page 11.0, para 4.2.17.1 (b), deletes references to microwave system.  
Page 11.0, para 4.2.17.2, " "

Reason for Change

The telephone link previously listed as microwave/fiber has been replaced with all fiber optics. The microwave functions as a link from GPUE Dispatch Center to monitor functions in the 230 KV substation.

Justification

The phone link via total fiber optics is an enhancement.

06 Specific Change

Page 15.0, para 4.5.1.6, change "Explosive Ordnance Detachment, Indiantown Gap 56<sup>th</sup> EOD" to "Explosive Ordnance Detachment (EOD) Indiantown Gap."

Page 34.0, Table 4.6.1, change 56<sup>th</sup> EOD to EOD

Reason for Change

The EOD Unit stationed at Fort Indiantown Gap had its designation changed from 56<sup>th</sup> EOD to 756<sup>th</sup> EOD.

Justification

This change is made to eliminate the designation of the unit to allow for future changes by the military without impacting the need to change this plan.

07 Specific Change

Page 17.0, para 4.5.3.2, the word "is" is change to "if".

Reason for Change

To correct a spelling error.

Justification

The change corrects a spelling error.

08 Specific Change

Page 56.0, Table 4.6.11.3, change "SECUIRYT" to "SECURITY".

Reason for Change

To correct a spelling error.

Justification

The change corrects a spelling error.



## TRAINING AND QUALIFICATION PLAN FOR TMI

REV 17

The changes made to the Training and Qualification Plan for TMI, Rev 17, do not represent any decrease in effectiveness. The changes as described in the following documentation encompass; the change in the security organization and approval signatures due to the sale of TMI from GPU Nuclear to AmerGen, the removal of an effective date for initial weapons qualification for a shotgun slug course, and a change in the designation of the Explosive Ordnance Disposal unit. Additionally, the word processing program was changed from "Wordperfect" to "Microsoft Word" which caused a change in the pagination of the document, therefore the entire document is considered a revision.

01. Specific Change:

Page 1.0, change logo from GPUN to AmerGen, associated document number is changed, and personnel titles to reflect new reporting structure are changed.

Reason for Change

Change is made due to the sale of Three Mile Island from GPU Nuclear to AmerGen.

Justification

The change is solely due to the sale of TMI and does not reflect any changes in the conduct of security functions.

02. Specific Change:

Page 11.0, para 4.1.5 (i) [2], the deletion of the statement that initial qualification for the shotgun slug course would be completed in the Fall of 1998.

Reason for Change

To delete the affected line.

Justification

The stated initial qualification was conducted in the Fall of 1998 and has been added to annual requalification.

03. Specific Change

Page 21.0, section 5.2, changes 56<sup>th</sup> EOD to EOD.

Page 23.0, section 5.13, changes 56<sup>th</sup> EOD to EOD.

Page 30.0, section 5.2, changes 56<sup>th</sup> EOD to EOD.

Page 31.0, section 5.12, changes 56<sup>th</sup> EOD to EOD.

Page 31.0, section 5.13, changes 56<sup>th</sup> EOD to EOD.

Reason for Change

The EOD Unit stationed at Fort Indiantown Gap had its designation changed from 56<sup>th</sup> EOD to 756<sup>th</sup> EOD.

Justification

This change is made to eliminate the designation of the unit to allow for future changes by the military without impacting the need to change this plan.

04. Specific Change

Page 28.0, section 4.5, deletion of reference to Unit 1.

Reason for Change

The only turnstiles in use are in the only processing center on site. The reference was left over from when there had been a separate processing center in Unit 2.

Justification

The change deletes an old reference to Unit 1 due to Unit 2 and reflects no decrease in the effectiveness of the security program.