

10 CFR 50.90

TMI-18-095

October 10, 2018

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Three Mile Island Nuclear Station, Unit 1
Renewed Facility Operating License No. DPR-50
NRC Docket Nos. 50-289

Subject: Supplement to License Amendment Request – Proposed Changes to Technical Specifications Sections 1.0, "Definitions," and 6.0, "Administrative Controls" for Permanently Defueled Condition

- References:
1. Letter from Michael P. Gallagher (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, " License Amendment Request – Proposed Changes to Technical Specifications Sections 1.0, "Definitions," and 6.0, "Administrative Controls" for Permanently Defueled Condition," dated November 10, 2017 (NRC Accession No. ML17314A024)
 2. Letter from U.S. Nuclear Regulatory Commission to Bryan C. Hanson, (Exelon Generation Company, LLC) "Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; Lasalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and Three Mile Island Nuclear Station, Unit 1 - Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018-LLA-0053) " dated August 2, 2018 (NRC Accession No. ML18206A282)

By letter dated November 10, 2017 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) to the U.S. Nuclear Regulatory Commission (NRC) for the Three Mile Island Nuclear Station, Unit 1 (TMI-1). The LAR proposed to revise or remove certain Technical Specifications (TS) Administrative Controls to reflect the permanently defueled condition.

On August 2, 2018, the NRC issued Amendment Number 294 (AMD 294) to TMI-1 (Reference 2). The approved amendment revised TS 6.3 to relocate the licensee's staff qualification requirements to the Exelon Quality Assurance Topical Report (QATR). The implementation of AMD 294 altered TS 6.3 from what was originally submitted in Reference 1.

This Supplement is to align TS 6.3 submitted in the LAR (Reference 1) with the now current TS amended through AMD 294.

Attachment 1 to this letter provides a description of the proposed changes to the TS submitted in Reference 1 in order to reflect the revisions necessitated by the implementation of AMD 294. Attachment 2 contains the markup pages depicting the proposed changes to the TS. The TS page being submitted in this letter supersedes in entirety the affected page submitted in Reference 1. Attachment 3 contains a regulatory commitment to ensure the Decommissioning Quality Assurance Program (DQAP) appropriately reflects the changes in this LAR.

Exelon has reviewed the information supporting a finding of no significant hazards consideration and the environmental consideration provided to the NRC in Reference 1. The additional information provided in this submittal does not affect the previously stated bases in Reference 1 for concluding that the proposed license amendment does not involve a significant hazards consideration. In addition, the information provided in this submittal does not affect the bases for concluding that neither an environmental impact statement nor an environmental assessment needs to be prepared in connection with the proposed amendment.

There is one new regulatory commitment contained within this submittal.

If you have any questions concerning this submittal, please contact Paul Bonnett at (610) 765-5264.

I declare under penalty of perjury that the foregoing is true and correct. Executed on the 10th day of October 2018.

Respectfully,



Michael P. Gallagher
Vice President, License Renewal & Decommissioning
Exelon Generation Company, LLC

- Attachments:
1. Supplement Information for License Amendment Request – Proposed Changes to Technical Specifications Sections 6.0, "Administrative Controls" for Permanently Defueled Condition
 2. Markup of Proposed Technical Specifications Pages
 3. Summary of Regulatory Commitments

cc: w/Attachments

Regional Administrator - NRC Region I
NRC Senior Resident Inspector – Three Mile Island Nuclear Station, Unit 1
NRC Project Manager, NRR – Three Mile Island Nuclear Station, Unit 1
NRC Project Manager, NRR – Three Mile Island Nuclear Station
Director, Bureau of Radiation Protection - PA Department of Environmental Resources

Attachment 1

Three Mile Island Nuclear Station

Docket No. 50-289

**Supplement Information for License Amendment Request – Proposed Changes to
Technical Specifications Sections 6.0, "Administrative Controls" for Permanently
Defueled Condition**

1.0 SUMMARY DESCRIPTION

By letter dated November 10, 2017 (Reference 1), Exelon Generation Company, LLC (Exelon) submitted a license amendment request (LAR) to the U.S. Nuclear Regulatory Commission (NRC) for the Three Mile Island Nuclear Station, Unit 1 (TMI-1). The LAR proposed to revise or remove certain Technical Specifications (TS) Administrative Controls to reflect the permanently defueled condition.

On August 2, 2018, the NRC issued Amendment Number 294 (AMD 294) to TMI-1 (Reference 2). The approved amendment revised TS 6.3 to relocate the licensee's staff qualification requirements to the Exelon Quality Assurance Topical Report (QATR). The implementation of AMD 294 altered TS 6.3 from what was originally submitted in Reference 1.

This Supplement is to align TS 6.3 that was submitted in the LAR (Reference 1) with the now current TS amended through AMD 294. The TS page being submitted in Attachment 2 supersedes in entirety the affected page submitted in Reference 1. Attachment 3 contains a regulatory commitment to ensure the changes in this LAR are appropriately reflected in the Decommissioning Quality Assurance Program (DQAP).

2.0 PROPOSED CHANGES

The proposed TS revision in Reference 1 stated the following:

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility 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. 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 *[No proposed changes]*

6.3.3 The NRC-approved training and retraining program for CERTIFIED FUEL HANDLERS shall be maintained.

Approved TS revision in AMD 294 (Reference 2) is as follows:

6.3 UNIT STAFF QUALIFICATIONS

6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications referenced for comparable positions specified in the Exelon Quality Assurance Topical Report.

[6.3.2 and 6.3.3 were removed by AMD 294 and left blank.]

In order to reflect the revisions necessitated by the implementation of AMD 294 Exelon proposes to revise the TS submitted in Reference 1 to be as follows:

6.3 FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications referenced for comparable positions specified in the Decommissioning Quality Assurance Program (DQAP).

6.3.2 The NRC-approved training and retraining program for CERTIFIED FUEL HANDLERS shall be maintained.

The proposed TS markups are included in Attachment 2. Proposed revisions are shown in ***bold-italics*** and deletions are shown using ~~strikethrough~~. The TS 6.4 and 6.5 remain unchanged from Reference 1 but are included as they are reflected on the marked-up page in Reference 1, Attachment 2. The page included in Attachment 2 is to replace in its entirety the same page as included in Reference 1, Attachment 2.

3.0 REFERENCES

1. Letter from Michael P. Gallagher (Exelon Generation Company, LLC) to U.S. Nuclear Regulatory Commission, " License Amendment Request – Proposed Changes to Technical Specifications Sections 1.0, "Definitions," and 6.0, "Administrative Controls" for Permanently Defueled Condition," dated November 10, 2017 (NRC Accession No. ML17314A024)
2. Letter from U.S. Nuclear Regulatory Commission to Bryan C. Hanson, (Exelon Generation Company, LLC) "Braidwood Station, Units 1 and 2; Byron Station, Unit Nos. 1 and 2; Calvert Cliffs Nuclear Power Plant, Units 1 and 2; Clinton Power Station, Unit No. 1; Dresden Nuclear Power Station, Units 2 and 3; James A. Fitzpatrick Nuclear Power Plant; LaSalle County Station, Units 1 and 2; Limerick Generating Station, Units 1 and 2; Nine Mile Point Nuclear Station, Units 1 and 2; Peach Bottom Atomic Power Station, Units 2 and 3; Quad Cities Nuclear Power Station, Units 1 and 2; R. E. Ginna Nuclear Power Plant; and Three Mile Island Nuclear Station, Unit 1 - Issuance of Amendments to Relocate the Staff Qualification Requirements (EPID L-2018-LLA-0053) " dated August 2, 2018 (NRC Accession No. ML18206A282)

Attachment 2

Proposed Technical Specifications (Marked-Up Pages)

6.3 UNIT/FACILITY STAFF QUALIFICATIONS

6.3.1 Each member of the ~~unit~~-*facility* staff shall meet or exceed the minimum qualifications referenced for comparable positions specified in the Exelon *Decommissioning* Quality Assurance *Program* ~~Topical Report~~.

6.3.2 *The NRC-approved training and retraining program for CERTIFIED FUEL HANDLERS shall be maintained.*

6.4 TRAINING DELETED

~~6.4.1 A training program for the Fire Brigade shall be maintained and shall meet or exceed the requirements of Section 600 of the NFPA Code.~~

6.5 DELETED

Attachment 3

Summary of Regulatory Commitments

Summary of Regulatory Commitments

The following table identifies commitments made in this document. (Any other actions discussed in the submittal represent intended or planned actions. They are described to the NRC for the NRC's information and are not regulatory commitments.)

Commitment	Committed Date or "Outage"	Commitment Type	
		One-Time Action (Yes/No)	Programmatic (Yes/No)
Per Amendment 294, the Staff Qualification requirements were relocated from TS 6.3 to the Quality Assurance Topical Report. Consistent with Amendment 294, the Staff Qualification wording from TS 6.3.1 and 6.3.2 in the proposed LAR (License Amendment Request – Proposed Changes to Technical Specifications Section 1.0, "Definitions," and 6.0, "Administrative Controls," for Permanently Defueled Condition," dated November 10, 2017 (ADAMS No ML17314A024)) will be relocated to the DQAP.	Prior to implementation of this License Amendment.	Yes	No