



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

December 18, 2020

Mr. John Sauger
President and Chief Nuclear Officer
TMI-2 Solutions, LLC
121 West Trade Street, Suite 2700
Charlotte, NC 28202

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2 – ISSUANCE OF
AMENDMENT NO. 64 RE: ORDER APPROVING TRANSFER OF LICENSE
AND CONFORMING LICENSE AMENDMENT (EPID L-2019-LLA-0257)

Dear Mr. Sauger:

By Order dated December 2, 2020 (Agencywide Documents Access and Management System (ADAMS) Accession No. ML20279A366), the U.S. Nuclear Regulatory Commission (NRC, the Commission) staff approved the transfer of Possession Only License (POL) No. DPR-73 for Three Mile Island Nuclear Station, Unit No. 2 (TMI-2). Specifically, the Order approved the transfer of the license from GPU Nuclear, Inc., Metropolitan Edison Company, Jersey Central Power and Light Company, and Pennsylvania Electric Company (collectively, the FirstEnergy Companies) to TMI-2 Solutions, LLC (TMI-2 Solutions). The Order also approved a draft conforming administrative amendment to the license to reflect the proposed transfer.

By letter dated December 9, 2020 (ADAMS Accession No. ML20350B569), TMI-2 Solutions provided satisfactory documentary evidence to the Director of the NRC's Office of Nuclear Material Safety and Safeguards (NMSS) that TMI-2 Solutions has obtained the appropriate amount of insurance required of a licensee under Title 10 of the *Code of Federal Regulations* (10 CFR) Part 140 and 10 CFR 50.54(w). Additionally, TMI-2 Solutions informed the Director of NMSS in writing that all required regulatory approvals of the proposed transfer actions had been received and that the closing date of the transfer would be December 18, 2020.

On December 18, 2020 (ADAMS Accession No. ML20353A163), TMI-2 Solutions informed the NRC that the transfer transaction closed on December 18, 2020.

Accordingly, the NRC staff is issuing Amendment No. 64 to POL No. DPR-73 for TMI-2 (Enclosure 1).

A copy of the related Safety Evaluation (ADAMS Accession No. ML20279A373) was provided with the Order dated December 2, 2020, approving the license transfer and the conforming amendment. Notice of Issuance of the conforming amendment will be included in the NRC's monthly *Federal Register* notice.

This letter also contains three signed original copies of Amendment No. 15 to Indemnity Agreement No. B-64 for TMI-2 (Enclosure 2). We request that you ensure that all parties sign the three originals and then that one of the signed originals is returned to the NRC's Document

Control Desk as proof of acceptance. Please keep the other signed original copies for each party's records.

In accordance with 10 CFR 2.390 of the NRC's "Agency Rules of Practice and Procedure," a copy of this letter will be available electronically for public inspection in the NRC Public Document Room or from the Publicly Available Records component of NRC's ADAMS. ADAMS is accessible from the NRC Web site at <https://www.nrc.gov/reading-rm/adams.html>.

If you have any questions concerning this action, please contact me at (301) 415-6721 or by e-mail to Ted.Smith@nrc.gov.

Sincerely,



Theodore B. Smith, Project Manager
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety and Safeguards

Docket No. 50-320

Enclosures:

1. Amendment No. 64 to POL No. DPR-73
2. Amendment No. 15 to Indemnity Agreement No. B-64 (3 copies)

cc:

Mr. Russell G. Workman
TMI-2 Solutions, LLC
423 West 300 South,
Suite 200
Salt Lake City, UT 841901

Mr. Daniel F. Stenger
Hogan Lovells US LLP
555 13th St NW
Washington, DC 20004

Mr. Gerry van Noordennen
EnergySolutions LLC
121 West Trade Street,
Suite 2700
Charlotte, NC 28202

Ms. Karen A. Sealy
FirstEnergy Service Company
76 South Main Street
Akron, OH 44308

Mr. Timothy P. Matthews
Morgan, Lewis & Bockius, LLP
1111 Pennsylvania Ave, NW
Washington, DC 20004

Listserv

SUBJECT: THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2 – ISSUANCE OF
AMENDMENT NO. 64 RE: ORDER APPROVING TRANSFER OF LICENSE
AND CONFORMING LICENSE AMENDMENT (EPID L-2019-LLA-0257) DATED
DECEMBER 18, 2020

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MHenderson, NMSS/REFS/FAB

SHarwell, NMSS/REFS/FAB

Suzanne Dennis, EDO

ADAMS Accession No.: ML20352A381

*by e-mail

| | | | | |
|--------|-------------------|-------------------|------------|-------------------|
| OFFICE | NMSS/DUWP/RDB/PM* | NMSS/REFS/FAB/BC* | OGC – NLO* | NMSS/DUWP/RDB/BC* |
| NAME | TSmith | RTurtill | JWachutka | BWatson |
| DATE | 12/16/2020 | 12/18/2020 | 12/18/2020 | 12/18/2020 |
| OFFICE | NMSS/DUWP/RDB/PM* | | | |
| NAME | TSmith | | | |
| DATE | 12/18/2020 | | | |

OFFICIAL RECORD COPY

ENCLOSURE 1

CONFORMING LICENSE AMENDMENT

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

POSSESSION ONLY LICENSE NO. DPR-73

DOCKET NO. 50-320



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

TMI-2 SOLUTIONS, LLC

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

DOCKET NO. 50-320

AMENDMENT TO POSSESSION ONLY LICENSE

Amendment No. 64
License No. DPR-73

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment to the Three Mile Island Nuclear Station, Unit No. 2 (herein "the facility" or "TMI-2") Possession Only License No. DPR-73 filed by GPU Nuclear, Inc. (herein "GPUN") dated November 12, 2019, as supplemented by letters dated December 12, 2019, March 18, 2020, and June 12, 2020; and email dated September 2, 2020, 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 and technical specifications are hereby amended as follows:
 - A. Changes to the license

The heading of the license is amended to replace "METROPOLITAN EDISON COMPANY, JERSEY CENTRAL POWER AND LIGHT COMPANY, PENNSYLVANIA ELECTRIC COMPANY, GPU NUCLEAR, INC." with "TMI-2 SOLUTIONS, LLC."

Section 1.A. is hereby amended to read as follows: "The application for the transfer of the possession only license from Metropolitan Edison Company, Jersey Central Power

and Light Company, Pennsylvania Electric Company, and GPU Nuclear, Inc. to TMI-2 Solutions, LLC (the Licensee) 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 Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I, and all required notifications to other agencies or bodies have been duly made;"

Section 2. is hereby amended to read as follows: "Possession Only License No. DPR-73 is hereby issued to TMI-2 Solutions, LLC to read as follows:"

Section 2.A. is hereby amended to read as follows: "This license applies to the Three Mile Island Nuclear Station, Unit 2, (the facility) owned by TMI-2 Solutions, LLC. The facility is located on Three Mile Island in the Susquehanna River in Londonderry Township, Dauphin County, Pennsylvania, about ten miles southeast of Harrisburg. Prior to entry into Post-Defueling Monitored Storage (PDMS), the facility is described in the Final Safety Analysis Report as supplemented and amended, the various Recovery System Descriptions and Technical Evaluation Reports and the Environmental Report as supplemented and amended. Upon entry into PDMS, the facility is described in the PDMS Safety Analysis Report as supplemented and amended and the Environmental Report as supplemented and amended."

Section 2.B.(1) is hereby amended to read as follows: "TMI-2 Solutions, LLC, pursuant to Section 103 of the Atomic Energy Act ("Act") and 10 CFR Part 50, 'Domestic Licensing of Production and Utilization Facilities,' to possess but not operate the facility;"

Section 2.B.(2) is hereby amended to read as follows: "TMI-2 Solutions, LLC to possess the facility at the designated location in Dauphin County, Pennsylvania, in accordance with the procedures and limitations set forth in this license;"

Section 2.B.(3) is hereby amended to read as follows: "TMI-2 Solutions, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any sealed sources for radiation monitoring equipment calibration;"

Section 2.B.(4) is hereby amended to read as follows: "TMI-2 Solutions, LLC, 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 or instrument calibration or associated with radioactive apparatus or components, and;"

Section 2.B.(5) is hereby amended to read as follows: "TMI-2 Solutions, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials which remain at the facility subsequent to the cleanup following the March 28, 1979, accident;"

Section 2.C.(1) is hereby amended to read as follows: "The Technical Specifications, as revised through Amendment No. 64 are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and all Commission Orders issued subsequent to the date of the possession-only license."

Section 2.C.(3) is added to read as follows: "Upon the date of closing, and proceeding until determination of completion of Phase 2 of facility decommissioning, TMI-2 Solutions will maintain a Financial Support Agreement in the amount of \$100M, less the value of any cash-funded Provisional Trust Account, Disposal Capacity Easement, and Letter of Credit procured by TMI-2 Solutions for the benefit of the Back-Up Trust Account under the Back-Up & Provisional Trust Agreement."

Section 2.C.(4) is added to read as follows: "At time of closing, EnergySolutions, Inc. will provide a Parent Guarantee in favor of the FirstEnergy Companies to guarantee the payment and performance of the obligations of TMI-2 Solutions as to the TMI-2 decommissioning. This guarantee makes the resources of EnergySolutions available to help ensure the successful decommissioning of TMI-2, assuring the ability of TMI-2 Solutions to (i) pay the costs of decommissioning the TMI-2 facility; (ii) protect the public health and safety; and (iii) meet NRC requirements."

Section 2.C.(5) is added to read as follows: "These financial support conditions (2.C.(3) and 2.C.(4)) may not be voided, canceled, or modified without the prior written consent of the NRC. These financial support conditions are in place and will be maintained as described in the application. The Director of the Office of Nuclear Material Safety and Safeguards shall be informed, in writing, no later than 10 working days after any funds are provided under the terms of the conditions listed above."

Section 2.G. is hereby amended to read as follows: "This license is effective as of the date of issuance and until the Commission notifies the licensee in writing that the license is terminated."

B. Changes to the Technical Specifications

Section 1.17 is hereby amended to read as follows: "An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by TMI-2 Solutions, LLC 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."

Section 1.18 is hereby amended to read as follows: "The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by TMI-2 Solutions, LLC. The SITE BOUNDARY for gaseous and liquid effluents shall be as shown in the Offsite Dose Calculation Manual (ODCM)."

Section 6.1.1 is hereby amended to read as follows: "The TMI-2 Solutions, LLC Project Director is responsible for the management of overall unit operations at Unit 2 and shall delegate in writing the succession to this responsibility during absence."

The title of Section 6.2.1 is amended to read as follows: "TMI-2 SOLUTIONS ORGANIZATION"

Section 6.2.1 is hereby amended to read as follows: "The TMI-2 Solutions, LLC organization for unit management and technical support shall be as in Section 10.5 of the PDMS SAR."

The title of Section 6.2.2 is amended to read as follows: "TMI-2 SOLUTIONS UNIT ORGANIZATION"

Section 6.12 b. is hereby amended to read as follows: "Shall become effective after review and acceptance by TMI-2 Solutions, LLC Project Director."

3. This license amendment is effective as of the date of its issuance and shall be implemented within 7 days of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in dark ink, appearing to read "Bruce A. Watson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bruce A. Watson, Chief
Reactor Decommissioning Branch
Division of Decommissioning, Uranium Recovery,
and Waste Programs
Office of Nuclear Material Safety
and Safeguards

Attachment:
Changes to Possession Only License No. DPR-73
Changes to Technical Specifications

Date of Issuance: December 18, 2020

ATTACHMENT TO LICENSE AMENDMENT NO. 64
THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2
POSSESSION ONLY LICENSE NO. DPR-73
DOCKET NO. 50-320

Replace the following pages of Possession Only License No. DPR-73 and the technical specifications with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

Possession Only License No. DPR-73

| <u>Remove</u> | <u>Insert</u> |
|---------------|---------------|
| 1 | 1 |
| 2 | 2 |
| 3 | 3 |
| 4 | 4 |
| 5 | 5 |

Technical Specifications

| <u>Remove</u> | <u>Insert</u> |
|---------------|---------------|
| 1-4 | 1-4 |
| 6-1 | 6-1 |
| 6-15 | 6-15 |

Enclosure 1, Attachment 1:

Changes to Possession Only License No. DPR-73

TMI-2 SOLUTIONS, LLC
DOCKET NO. 50-320
THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2
POSSESSION ONLY LICENSE

Amendment No. 64
License No. DPR-73

1. The U.S. Nuclear Regulatory Commission (the NRC or the Commission) has found that:
 - A. The application for the transfer of the possession only license from Metropolitan Edison Company, Jersey Central Power and Light Company, Pennsylvania Electric Company, and GPU Nuclear, Inc. to TMI-2 Solutions, LLC (the Licensee) 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 Title 10 of the *Code of Federal Regulations* (10 CFR) Chapter I, and all required notifications to other agencies or bodies have been duly made;
 - B. The facility will be maintained in conformity with the application, as amended, the provisions of the Act, and the rules and regulations of the Commission except for those exemptions from specific portions of the regulations, previously granted by the Commission, and still applicable;
 - C. There is reasonable assurance: (i) that the activities authorized by this possession only license can be conducted without endangering the health and safety of the public; and (ii) that such activities will be conducted in compliance with the rules and regulations of the Commission;
 - D. The licensee is technically qualified to engage in the activities authorized by this possession only license in accordance with the rules and regulations of the Commission;
 - E. The licensee is financially qualified to engage in the activities authorized by this possession only license in accordance with the rules and regulations of the Commission;
 - F. The licensee has 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 possession only 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, and other costs and considering available alternatives, the issuance of Possession Only License No. DPR-73 subject to the conditions for protection of the environment set forth herein is in accordance with 10 CFR Part 51

Possession Only License No. DPR-73
Amendment No. 64

of the Commission's regulations and all applicable requirements have been satisfied;
and

- I. The possession of byproduct and special nuclear material and receipt, possession, and use of source material as authorized by the license will be in accordance with the Commission regulations in 10 CFR Parts 30, 40, and 70, including 10 CFR Sections 30.33, 40.32, 70.23, and 70.31.
2. Possession Only License No. DPR-73 is hereby issued to TMI-2 Solutions, LLC to read as follows:
 - A. This license applies to the Three Mile Island Nuclear Station, Unit 2, (the facility) owned by TMI-2 Solutions, LLC. The facility is located on Three Mile Island in the Susquehanna River in Londonderry Township, Dauphin County, Pennsylvania, about 10 miles southeast of Harrisburg. Prior to entry into Post-Defueling Monitored Storage (PDMS), the facility is described in the Final Safety Analysis Report as supplemented and amended, the various Recovery System Descriptions and Technical Evaluation Reports and the Environmental Report as supplemented and amended. Upon entry into PDMS, the facility is described in the PDMS Safety Analysis Report as supplemented and amended and the Environmental Report as supplemented and amended.
 - B. Subject to the conditions and requirements incorporated herein, the Commission hereby licenses:
 - (1) TMI-2 Solutions, LLC, pursuant to Section 103 of the Atomic Energy Act ("Act") and 10 CFR Part 50, "Domestic Licensing of Production and Utilization Facilities," to possess but not operate the facility;
 - (2) TMI-2 Solutions, LLC to possess the facility at the designated location in Dauphin County, Pennsylvania, in accordance with the procedures and limitations set forth in this license;
 - (3) TMI-2 Solutions, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to receive, possess, and use at any time any sealed sources for radiation monitoring equipment calibration;
 - (4) TMI-2 Solutions, LLC, 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 or instrument calibration or associated with radioactive apparatus or components; and
 - (5) TMI-2 Solutions, LLC, pursuant to the Act and 10 CFR Parts 30, 40, and 70, to possess, but not separate, such byproduct and special nuclear materials which remain at the facility subsequent to the cleanup following the March 28, 1979, accident.

The storage of radioactive materials or radwaste generated at TMI Unit 1 and stored at TMI Unit 2 in accordance with the license for TMI Unit 1 shall not result in

a source term that, if released, would exceed that previously analyzed in the PDMS Safety Analysis Report in terms of off-site dose consequences.

- C. This license shall be deemed to contain and is subject to the conditions specified in the Commission's regulations in 10 CFR Chapter I, and is subject to all applicable provisions of the Act and to the Commission's rules and regulations, except for those exemptions from specific portions of the regulations granted by the Commission and still applicable, and orders of the Commission now or hereafter in effect; and is subject to the additional conditions specified or incorporated below:

(1) Technical Specifications

The Technical Specifications, as revised through Amendment No. 64 are hereby incorporated into this license. The licensee shall operate the facility in accordance with the Technical Specifications and all Commission Orders issued subsequent to the date of the possession only license.

(2) Physical Protection

The licensee utilizes site physical security, guard training and qualification, and safeguards contingency plans maintained by Unit 1. These plans are administered under TMI-1 license condition 2.C.(3) and shall apply to TMI-2.

- (3) Upon the date of closing, and proceeding until determination of completion of Phase 2 of facility decommissioning, TMI-2 Solutions will maintain a Financial Support Agreement in the amount of \$100M, less the value of any cash-funded Provisional Trust Account, Disposal Capacity Easement, and Letter of Credit procured by TMI-2 Solutions for the benefit of the Back-Up Trust Account under the Back-Up & Provisional Trust Agreement.

- (4) At time of closing, EnergySolutions, Inc. will provide a Parent Guarantee in favor of the FirstEnergy Companies to guarantee the payment and performance of the obligations of TMI-2 Solutions as to the TMI-2 decommissioning. This guarantee makes the resources of EnergySolutions available to help ensure the successful decommissioning of TMI-2, assuring the ability of TMI-2 Solutions to (i) pay the costs of decommissioning the TMI-2 facility; (ii) protect the public health and safety; and (iii) meet NRC requirements.

- (5) These financial support conditions (2.C.(3) and 2.C.(4)) may not be voided, canceled, or modified without the prior written consent of the NRC. These financial support conditions are in place and will be maintained as described in the application. The Director of the Office of Nuclear Material Safety and Safeguards shall be informed, in writing, no later than 10 working days after any funds are provided under the terms of the conditions listed above.

- D. Special Auxiliary and Fuel Handling Building Ventilation Study: Prior to terminating continuous operation of the auxiliary and fuel handling buildings (AFHB) ventilation systems, the special monitoring program of AFHB airborne levels shall be completed. The program shall include at least 1 year of data prior to entry into PDMS and at least 1 year of data after entry into PDMS. A report shall be submitted to the NRC containing the results of the program containing sufficient data and analyses to demonstrate that the release rate of particulates with half-lives greater than 8 days from the AFHB will be less than 0.00024 $\mu\text{Ci/sec}$ when averaged over

any calendar quarter. Not included in the calculation of the particulate release rate shall be those periods of time (designated in advance) prior to entry into PDMS during which aggressive decontamination operations were performed in preparation for PDMS. The report shall be submitted to the NRC staff at least 60 days prior to terminating continuous operation of the AFHB ventilation systems.

- E. Unfiltered Leak Rate Test: Prior to entry of the facility into Post-Defueling Monitored Storage, the licensee will develop an NRC-approved surveillance requirement for the reactor building unfiltered leak rate test that, upon staff approval, will be incorporated as Section 4.1.1.2 of the proposed PDMS Technical Specifications.
- F. Additional Submittals Prior To Post-Defueling Monitored Storage: Prior to entry of the facility into Post-Defueling Monitored Storage, the licensee will submit and implement a site Flood Protection Plan, a site Radiation Protection Plan, an Offsite Dose Calculation Manual, a Post-Defueling Monitored Storage Fire Protection Program Evaluation, a Post-Defueling Monitored Storage Quality Assurance Plan and a Radiological Environmental Monitoring Plan. Additionally, the licensee will submit to the NRC the results of the completed plant radiation and contamination surveys prior to entry into PDMS.
- G. This license is effective as of the date of issuance and until the Commission notifies the licensee in writing that the license is terminated.

FOR THE NUCLEAR REGULATORY COMMISSION

**(Original signed by
Alfred E. Chaffee acting for)**
Brian K. Grimes, Director
Division of Operating Reactor Support
Office of Nuclear Reactor Regulation

Enclosure:
Appendices A & B
Technical Specifications

Date of Issuance: December 18, 2020

Enclosure 1, Attachment 2:
Changes to Technical Specifications

1.0 DEFINITIONS

MEMBER(S) OF THE PUBLIC

- 1.16 MEMBER(s) OF THE PUBLIC means any individual except when that individual is receiving an occupational dose.

UNRESTRICTED AREA

- 1.17 An UNRESTRICTED AREA shall be any area at or beyond the SITE BOUNDARY access to which is not controlled by TMI-2 Solutions, LLC 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.

SITE BOUNDARY

- 1.18 The SITE BOUNDARY shall be that line beyond which the land is neither owned, nor leased, nor otherwise controlled by TMI-2 Solutions, LLC. The SITE BOUNDARY for gaseous and liquid effluents shall be as shown in the Offsite Dose Calculation Manual (ODCM).

NPDES PERMIT

- 1.19 The NPDES PERMIT is the National Pollutant Discharge Elimination System (NPDES) Permit No. PA0009920, effective January 30, 1975, Issued by the Environmental Protection Agency to Metropolitan Edison Company. This permit authorized Metropolitan Edison Company to discharge controlled wastewater from Three Mile Island (TMI) Nuclear Station Into the waters of the Commonwealth of Pennsylvania.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

- 6.1.1 The TMI-2 Solutions, LLC Project Director is responsible for the management of overall unit operations at Unit 2 and shall delegate in writing the succession to this responsibility during absence.

6.2 ORGANIZATION

TMI-2 SOLUTIONS ORGANIZATION

- 6.2.1 The TMI-2 Solutions, LLC organization for unit management and technical support shall be as in Section 10.5 of the PDMS SAR.

TMI-2 SOLUTIONS UNIT ORGANIZATION

- 6.2.2 The unit organization shall be as described in Section 10.5 of the PDMS SAR and an individual qualified in radiation protection procedures shall be on site whenever Radioactive Waste Management activities are in progress.

6.3 UNIT STAFF QUALIFICATIONS

- 6.3.1 Each member of the unit staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions unless otherwise noted in the Technical Specifications. The requirements of ANSI N18.1-1971 that pertain to operator license qualifications for unit staff shall not apply.

- 6.3.2 The management position responsible for radiological control or his deputy shall meet or exceed the qualifications of Regulatory Guide 1.8 of 1977. Each Radiological Controls Technician in a responsible position shall meet or exceed the qualifications of ANSI N18.1-1971, paragraph 4.5.2 or 4.3.2, or be formally qualified through an NRC-approved TMI 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.

6.4 **DELETED**

ADMINISTRATIVE CONTROLS

6.12 OFFSITE DOSE CALCULATION MANUAL (ODCM)

SUBSTANTIVE CHANGES to the ODCM:

- a. Shall be documented and records of reviews performed shall be realized as required by Specification 6.9.2v. 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 20.1301, 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 TMI-2 Solutions, LLC Project Director.
- c. Shall be submitted to the Commission in the form of a complete, legible copy of the entire ODCM as 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.

6.13 EXCEPTIONAL OCCURRENCES

UNUSUAL OR IMPORTANT ENVIRONMENTAL EVENTS

- 6.13.1 Any occurrence of an unusual or important event that causes or could potentially cause significant environmental impact causally related with station operation shall be recorded and reported to the NRC per Subsection 6.8.3.1. The following are examples of such events: excessive bird impaction events on cooling tower structures or meteorological towers (i.e., more than 100 in any one day); onsite plant or animal disease outbreaks; unusual mortality of any species protected by the Endangered Species Act of 1973; fish kills near or downstream of the site.

EXCEEDING LIMITS OF RELEVANT PERMITS

- 6.13.2 Any occurrence of exceeding the limits specified in relevant permits and certificates issued by other Federal and State agencies which are reportable to the agency which issued the permit shall be reported to the NRC in accordance with the provisions of Subsection 6.8.3.2. This requirement shall apply only to topics of National Environmental Policy Act concern within the requirements of the Station NPDES permit as related to TMI-2 discharges.

6.14 DELETED

ENCLOSURE 2

AMENDMENT NO. 15 TO INDEMNITY AGREEMENT NO. B-64

THREE MILE ISLAND NUCLEAR STATION, UNIT NO. 2

POSSESSION ONLY LICENSE NO. DPR-73

DOCKET NO. 50-320

(THREE SIGNED ORIGINAL COPIES)