



METROPOLITAN EDISON COMPANY

117 OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601  
AUG 23 1974

GGE-0264

Mr. James P. O'Reilly, Director  
Directorate of Regulatory Operations - Region 1  
U. S. Atomic Energy Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. O'Reilly:

Docket No. 50-320  
License No. CPPR-66  
Inspection No. 50-320/74-04

This letter and the enclosure with this letter are in response to your inspection report letter of July 16, 1974, concerning Mr. Folsom's June 27 and 28, 1974, inspection of Three Mile Island Nuclear Station, Unit 2, and the findings thereof.

Sincerely,

*RCA*  
R. C. Arnold  
Vice President

RCA/JFV/cas  
Enclosure: Response to Description  
of Apparent Violations  
File: 20.1.1/

20 358

7905070326

ENCLOSURE

Metropolitan Edison Company  
Three Mile Island Nuclear Station, Unit 2  
Docket No. 50-320  
License No. CPFR-66  
Inspection No. 50-320/74-04

Response to Description of Apparent Violations

Apparent Violation 1

Criterion III, Design Control, Appendix B, 10 CFR 50, states in part, "Measures shall also be established for the selection and review for suitability of applications of materials, parts, equipment and process that are essential to the safety-related functions of the structures, systems and components."

Contrary to the above, certain portions of the temporary polar crane support towers were permanently embedded into the containment structure concrete without required documentation.

Response:

A review of the documentation required to embed the polar crane support towers into the fuel pool wall has indicated that the documentation is present in a series of Engineering Deviation Requests initiated by the construction contractor and approved by the architect engineer. From this it is concluded that no violation actually existed. In support of this conclusion, please refer to Inspection No. 50-320/74-05, later conducted by Mr. Folsom on Unit 2 on July 9 and 10, 1974.

Apparent Violation 2

Criterion VI, Document Control; Appendix B, 10 CFR 50, states in part, "Measures shall be established to control---drawings, including changes thereto, which prescribe all activities affecting quality. These measures shall assure that documents are---used at the locations where the prescribed activity is performed."

Contrary to the above, a random selection by our inspector of drawings on several stick files in the field showed that 21% of the drawings had been superseded. A similar condition was reported to you in our letter of August 29, 1972.

Response:

a. Corrective Actions

A complete audit of all contractor and subcontractor drawing control procedures was performed. Of the 38,163 drawings audited, 159 were found to be outdated. These outdated drawings were immediately replaced or removed.

20 359

b. Preventative Actions to Avoid Further Violations

Contractor management has reinstructed its construction supervision and drawing control personnel in their responsibility to keep all drawings up-to-date in each construction department. In addition, the contractor will have drawing control signs erected in all of those areas where drawing control should be practiced and will review all drawings in each construction department for the purpose of eliminating unnecessary drawings and thereby reducing the total number of drawings in the field. These two actions are expected to be completed by September 30, 1974.

c. Compliance

It is Met-Ed's position that sufficient corrective actions have been completed, preventative actions planned, and that compliance has been achieved.

20 360