

SEP 24 1974

Harold D. Thornburg, Chief
Field Support and Enforcement Branch
Directorate of Regulatory Operations

CIVIL PENALTY ACTION - METROPOLITAN EDISON COMPANY - LICENSE
NO. DPR-50 - THREE MILE ISLAND, UNIT 1 (YOUR REQUEST OF
9/19/74)

Please find attached our comments regarding the subject.

Original Signed by
J. G. Whiteaker

James G. Whiteaker, Chief
Materials and Plant Protection Branch
Directorate of Regulatory Operations

Enclosure:
As Stated Above

cc: Carl W. Kuhlman, w/encl

Memo

50-289

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OFFICE →	RO;MPPB	RO;MPPB				
SURNAME →	LCSolem:leg	JGWhiteaker			1413 359	Q
DATE →	9/24/74	9/24/74				

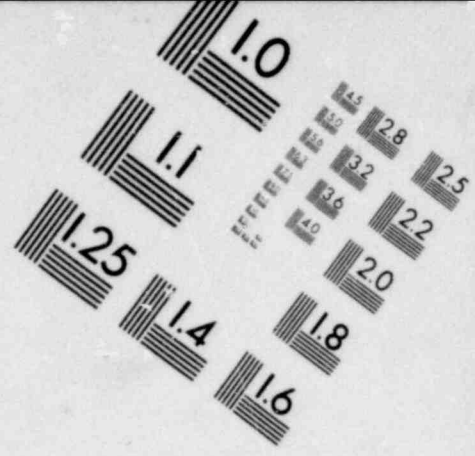
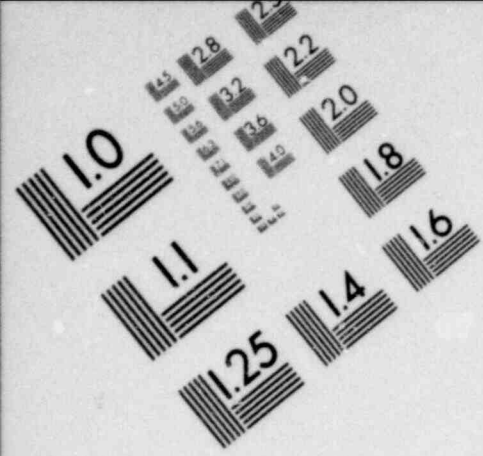
ENCLOSURE

RO:MPPB COMMENTS - DRAFT CIVIL PENALTY ACTION
THREE MILE ISLAND, UNIT 1

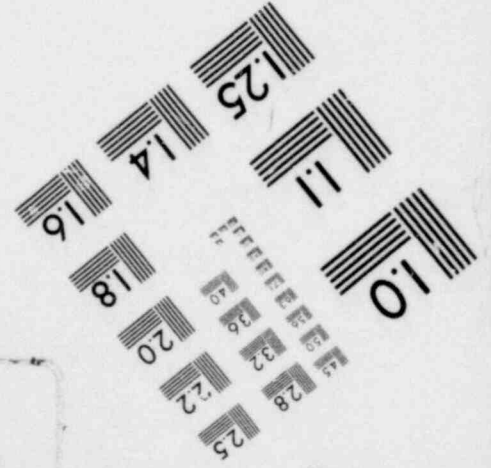
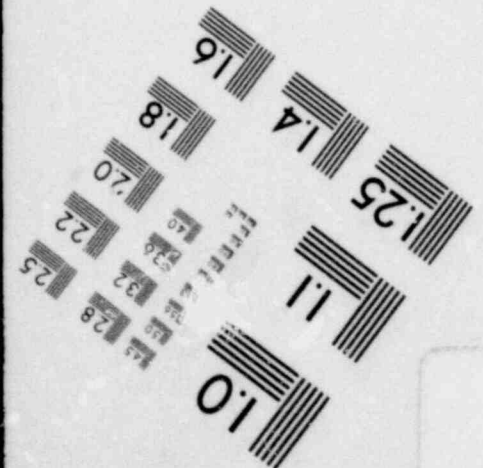
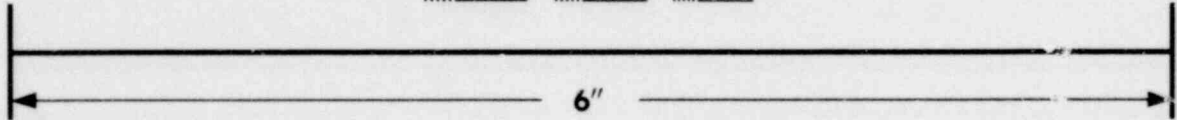
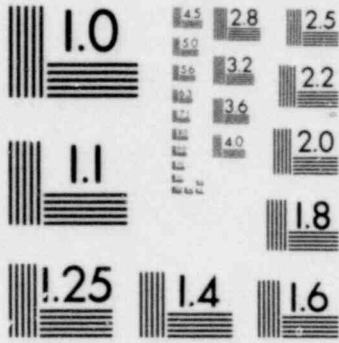
In general there may be questions regarding the issuance of a civil monetary penalty action.

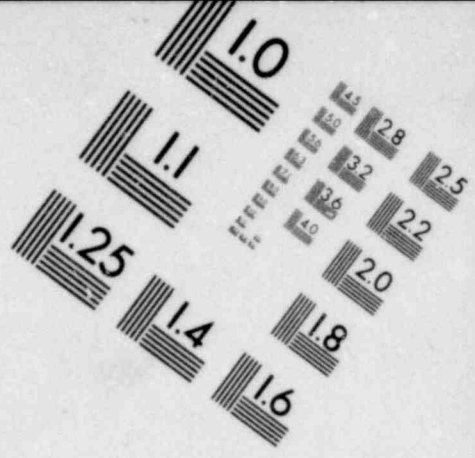
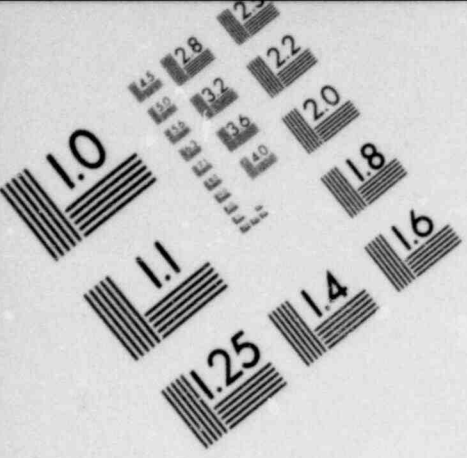
1. License DPR-50 was issued effective April 9, 1974. The September 10-12 inspection by RO-I is the first inspection of License DPR-50. Two prior inspections, initial January 10-11, 1974, and second, April 11-12 and 16-17, 1974, covered SNM-1313. Physical security was inspected, but no enforcement actions or unusual occurrences were stated in those reports.
2. Three Mile Island, Unit 1, security plan was approved by the Directorate of Licensing by letter dated September 10, 1974. Prior to that date, Licensing had questioned the procedural details regarding locks and alarms for vital areas. We understand that in lieu of locks and alarms additional guard checks were initiated.
3. The draft Notice of Violation references Section 2.3 of the Security Plan's Administration Procedure AP1011.1. Revision C, dated February 13, 1974. This procedure is an administrative procedure implementing Three Mile Island's physical security plan. These implementing procedures are not required to be submitted for AEC approval.
4. As concerns the letter of November 1, 1972, to all licensees, "Criteria for Determining Enforcement Action," because of the newness of the license (SNM-1313 issued 12/11/73 and DPR-5 issued 5/19/74), there is a question as to whether the licensee is aware of its content, and the enforcement action available to the Commission.

1413 360



**IMAGE EVALUATION
TEST TARGET (MT-3)**





**IMAGE EVALUATION
TEST TARGET (MT-3)**

