



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

August 4, 1977
GQL 1057

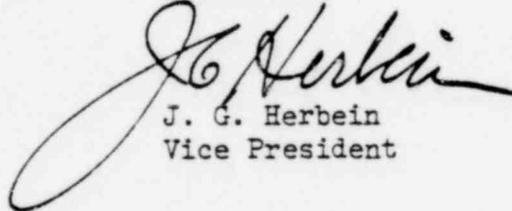
Mr. Eldon J. Brunner, Chief
Reactor Operations and Nuclear Support Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Docket No. 50-289
Operating License No. DPR-50
Three Mile Island Nuclear Station, Unit I
Inspection Report No. 77-18

This letter and the enclosures are in response to your inspection letter of July 12, 1977, concerning Mr. Donaldson's inspection of TMI-1 and the resultant findings of five (5) apparent infractions.

Sincerely,



J. G. Herbein
Vice President

JGH:DGM:tas

Enclosures

~~1454 49~~

7910170 859

1476 058

Metropolitan Edison Company
Three Mile Island Nuclear Station Unit 1 (TMI-1)
Docket No. 50-289
License No. DPR-50
Inspection No. 77-18

Infraction A

Three Mile Island 1 Technical Specification 6.8.1 and 6.11 require that procedures are followed. Emergency Procedure 1670.12 and Health Physics Procedure 1778 require that quarterly checks and inventories be performed on all emergency equipment and that the Radiation Protection Foreman approve all inspections results.

Contrary to the above, on several occasions during the period August 1976 through May 1977, quarterly inventories of emergency equipment were either not performed or not performed as required.

Response to Infraction A

While the NRC inspection was still in progress, an inventory of all items required in the emergency kits, according to HPP 1778, was completed.

Since that time an investigation was conducted to determine the cause of the infraction. We concluded that, while our present tickler system identifies tasks to be performed in the department, it does not have a positive method to closeout tasks. If a task was not completed, it had to be manually transferred to the next days task list. The task program is being revised. We are preparing a list of department tasks which will put task# on a predetermined schedule. The new program will have a work sheet with a positive removal feature, i.e., the task will reappear until it is manually removed. In addition, the Radiation Protection Supervisor will review the task list a minimum of three times per week until the computer program is in effect. This responsibility may be transferred to the Radiation Protection Foreman after the new program has been satisfactorily verified to be operable and accurate.

The input to the computer program is one-third complete and will be in use by September 1, 1977.

Infraction B

Technical Specification 6.11 requires that radiation safety procedures be followed for all operations affecting personnel exposures. Health Physics Procedure 1749, Paragraphs 2.0 and 5.1 and Table 1740-1 require that dosimeters be leak tested semi-annually.

Contrary to the above, dosimeters stocked in the various emergency kits were not tested as required during the period August 1976 through May 1977.

~~1454-550~~

1476 059

Response to Infraction B

At the time of the inspection, all the dosimeters were replaced with freshly calibrated ones. (Leak testing is included in the calibration).

The inventory sheets have been changed to require the person who conducts the inventory to list the dates of calibration for the dosimeters. This will prevent dosimeters overdue for calibration from appearing in the kits. This provides two checks. One check is done by the person conducting the inventory; the second check is performed by the Radiation Protection Supervisor/Foreman who must sign the completed inventory form.

Full compliance was achieved on June 10, 1977. The permanent procedure change will be distributed by September 1, 1977 to prevent recurrence.

Infraction C

10 CFR 20.21(b) requires that each licensee make or cause to be made such surveys as may be necessary to comply with the regulatory requirements specified in 10 CFR Part 20.

Contrary to the above, on June 7, 1977 a drum containing radioactive waste was placed into an area which was posted as a radiation area without subsequent surveying of the area to ensure that it was properly posted per 10 CFR 20.203. This drum placement resulted in the creation of a high radiation area which was not posted in accordance with the requirements of 10 CFR 20.203(c), nor barricaded as required by Technical Specification 6.13.1a. Specifically:

Radiation levels at the trash compacting area boundary exceeded 100 mR/hr yet the area was posted as a radiation area rather than a high radiation area as required by 10 CFR 20.203(c).

Response to Infraction C

The drum of radioactive material was moved to another location inside the Radioactive Waste Area, and we are now in full compliance.

In the future the utility men who collect waste and clothing throughout the controlled area will be required to carry a Beta-Gamma doserate instrument and use it while making their rounds. If they encounter any abnormal radiation levels they are instructed to notify the Health Physics Department as soon as possible. An RWP specifying a Dose Rate Instrument will be used during collection of trash. Additionally, workers will be required to monitor the radiation levels in trash barrels upon completion of their work.

During the months of June and July special training sessions were held by the Radiation Protection Foreman. These training sessions covered health physics practices and special emphasis was given to the need for strict compliance to Health Physics Procedures. Two one hour sessions were held each day for three days during each of two weeks. Attendance was required of all station personnel and records were maintained by the Training Department. All those who have not yet attended this special training session will receive it in later sessions.

~~1454 351~~

1476 060

Infraction D

Three Mile Island 1 Technical Specification 6.13.1a requires that entrance into high radiation areas be controlled by issuance of a radiation work permit.

Contrary to the above, on June 7, 1977, a utility worker was permitted entry into a high radiation area in the vicinity of the condensate water storage tank pumps without issuance of a radiation work permit.

Response to Infraction D

RWP's will be used in collection and transfer of trash in the controlled area. In addition, the requirements for use and compliance with RWP will be given greater emphasis during General Employee Training.

Full compliance was attained by July 31, 1977.

During the months of June and July special training sessions were held by the Radiation Protection Foreman. These training sessions covered health physics practices and special emphasis was given to the need for strict compliance to Health Physics Procedures. Two one hour sessions were held each day for three days during each of two weeks. Attendance was required of all station personnel and records were maintained by the Training Department. All those who have not yet attended this special training session will receive it in later sessions.

Infraction E

Three Mile Island 1 Technical Specification 6.11 requires that procedures for all operations involving personnel radiation exposure be followed. Health Physics Procedure 1613 (Radiation Work Permits), Paragraph 5.2.4.1 requires that the block "Dose Rate Instrument" be checked for all radiation work permits issued for entry into high radiation areas.

Contrary to the above, on June 1, 1977, a radiation work permit was improperly issued in that the "Dose Rate Instrument Block" was not checked on a permit issued for entry into a high radiation area for the purpose of performing maintenance on a condensate water storage tank pump.

Response to Infraction E

The Supervisor of Chemistry and Health Physics conducted a special training session with the entire Health Physics Department concerning all the infractions in this inspection. The Senior Technicians were instructed during this training session to read the radiation work permits more carefully before approving, with particular attention to be paid to specific requirements for each permit.

Full compliance was achieved on July 14, 1977.

In order to assure continued compliance, the on-site QC group was requested to surveil health physics practices throughout the plant.

Deviation

In a related observation, the inspector noted that a controlled area wet vacuum and floor scrubber were standing on absorbent paper in preparation for their

~~1454 752~~ 1476 061

movement for storage into a radiation area. Surveys of these items indicated radiation levels of approximately 15 mR/hr at 1" from the surface of the tank and around the brushes of the scrubber. The inspector observed the individual performing the movement of the equipment into the radiation area and noted that the movement and disposal of the absorbent paper waste was accomplished while the individual was smoking. The inspector informed the licensee that the handling of potentially contaminated waste and internally contaminated equipment while smoking constituted a deviation from standard health and safety practices of the industry. (77-18-06)

Response to Deviation

The individual who was smoking while handling potentially contaminated material received a stern lecture from a radiation protection foreman and cautioned as to the potential hazards associated with smoking in a controlled area.

The precautions were covered in the General Employee Training. However, they may not be adequately stressed. The prohibition against eating, drinking, and smoking while handling potentially contaminated material will be emphasized and will be covered in the exam administered at the conclusion of the General Employee Training. This will be included in the next General Employee Training Session.

Full compliance will be achieved by September 1, 1977.

~~1454 353~~

1476 062