



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

September 28, 1972

Mr. J. P. O'Reilly
Director, Region 1
Directorate of Regulatory Operations
U. S. Atomic Energy Commission
970 Broad Street
Newark, New Jersey 07102

Subject: Three Mile Island Nuclear Station
Resolution of AEC Findings Regarding
Document Control and Storage of Non-
conforming Material

Dear Mr. O'Reilly:

Your letter of August 29, 1972, refers to inspections performed by AEC-DRO personnel at the TMI site during July 11 to 14, 1972. Your letter indicates that there were two areas noted where activities at the TMI site were in apparent nonconformance with the AEC quality assurance criteria in Appendix B to 10 CFR 50. These apparent nonconformances, and our resolution of them, are as follows:

1. Finding

A random check of drawings in the field indicated that 31% of the drawings were superseded and 26% were illegible as to title, revision number, or drawing number, and their status could not be determined.

Resolution

Earlier this Spring, our own quality assurance surveillance system had alerted us to the need to upgrade the site drawing control system, and we had initiated corrective action with United Engineers and Constructors (UE&C). Our review of drawings in the field has indicated that many of the out-of-date or illegible drawings were being retained for informational purposes rather than for control work. We recognize that this should have been indicated on the

1566 203

7911110007

drawings. We have essentially completed a thorough upgrading of the drawing control system at the TMI site to ensure that all drawings used to control work are up-to-date and all informational drawings are clearly identified as not being for construction. This upgrading included:

- a. Detailed auditing of documentation control at the TMI site was performed to identify the areas requiring correction.
- b. Revisions and clarifications have been issued to the UE&C procedures for drawing control and for control of QC procedures.
- c. The Gilbert Associates and Burns & Roe master drawing lists are being clarified to facilitate drawing control.
- d. Each UE&C construction organization has thoroughly reviewed their drawings to assure that only up-to-date drawings are in use.
- e. UE&C has re-emphasized to their construction supervision the need to follow document control procedures. In this regard, the responsibilities for keeping documents up-to-date in each construction department have been clarified and documented in the applicable UE&C procedures. Additional document control personnel have been assigned to this work.
- f. Re-audits have been and will again be performed to assure that the upgraded document control system is effective.

2. Finding

The designated quarantine storage area at the site contained items which were not in a hold status. In addition, it was noted that tagged nonconforming items were in storage outside of the quarantine area.

Resolution

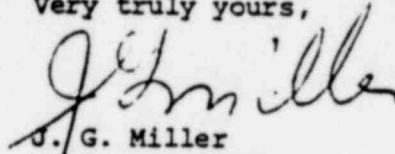
The applicable UE&C storage procedure has been revised to emphasize that only "Reject" items shall be stored in the "Reject" storage area. The procedure has also been revised to emphasize that, while items on "Hold" are not given segregated storage, their storage locations are logged and they may not be released from storage except on a waiver basis as permitted by the procedure for control of nonconforming material.

1566 204

In regard to storing all reject items in a segregated "Reject" storage area, this is sometimes not practical, e.g., for large vessels. The applicable UE&C procedure requires use of segregated storage when practicable.

We consider that the above actions satisfactorily resolve the findings in your letter of August 29, 1972.

Very truly yours,


J. G. Miller
Vice President

1566 205