METROPOLITAN EDISON COMPANY (SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION)

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603 TELEPHONE 215 – 929-3601

NOV 2 9 1974

GQL 0522

Mr. Robert T. Carlson, Chief
Facility Construction and Engineering Support Branch
Directorate of Regulatory Operations - Region 1
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Carlson:

Docket No. 50-320
Construction Permit CPPR-66
Inspection No. 50-320/74-06

This letter and the enclosure with this letter are in response to your inspection report of October 25, 1974, concerning Mr. Folsom's September 24-26, 1974, inspection of our Three Mile Island Nuclear Station, Unit 2, and the findings thereof.

Sincerely,

R C Arnold

R. C. Arnold
Vice President

RCA:JFV:tas

Enclosure: Response to Description of Apparent Violations

File: 20.1.1/7.7.3.2.2

cc: R. L. Wayne, QA Manager, Design & Construction
T. M. Crimmins, Jr., Safety & Licensing Manager
R. W. Heward, Jr., Project Manager
W. A. Verrochi, Vice President, Design & Construction
Gerald Charnoff, Esquire

89 190

7904300160

7904300161

ENCLOSURE

Metropolitan Edison Company
Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Docket No. 50-320
Construction Permit CPPR-66
Inspection No. 50-320/74-06

Response to Description of Apparent Violations

Apparent Violation

"Criterion V of Appendix B of 10CFR50 requires that activities affecting quality be accomplished in accordance with documented instructions, procedures, or drawings.

Contrary to the above, it was observed that unused low hydrogen welding electrodes were left in an open container exposed to the atmosphere for an extended period. This was in violation of site directive MCP-2-2 which requires that unused low hydrogen filler material in opened containers be returned to the issuing crib within four hours."

Corrective Actions

An investigation was begun upon discovery of the above referenced situation, and the investigation disclosed that

a. the situation occurred despite adequate procedural controls,

b. the welder who was responsible for the electrodes simply failed to report when they became missing, and

c. the use of these electrodes did not affect quality, in that the electrodes were used only to mount a temporary holding bracket, the function of which was to hold another component in position while the component was being erected.

For this situation, immediate corrective actions consisted of

a. destroying the subject electrodes, thus ensuring that they would not be used in future applications, and

b. making a determination, that there were no previous applications of these electrodes which could have effected quality.

Preventative Actions

89 191

To avoid violations of this type in the future, the following preventative actions have been taken:

a. B & W's welding supervisors have instructed, in detail, the crib attendants in welding electrode control procedure,

b. for those cases in which welders are working and electrodes may be

dropped and become unretreviable by the welder himself, the labor forces have been increased and instructed to scrap all electrodes so found, and

c. procedures have been up-graded such that all welding electrodes are now issued in a numbered container that must be returned and accounted for at the end of each shift by the crib attendant and welding supervisor or his assistant.

Compliance

Adequate corrective and preventative actions have been completed, and compliance has been achieved.