



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

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February 8, 1979
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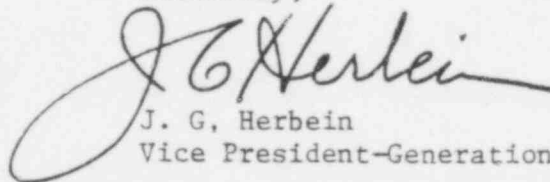
Mr. Robert T. Carlson, Chief
U. S. Nuclear Regulatory Commission
Reactor Construction & Engineering Support Branch
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Sir:

Three Mile Island Nuclear Station Units 1 & 2 (TMI-1 & TMI-2)
Operating License Nos. DPR-50 and DPR-73
Docket Nos. 50-289 and 50-320
Inspection Reports Nos. 78-25 & 78-38

This letter and the attachment are in response to your inspection findings letter of January 17, 1979 concerning Mr. L. Gage's inspection of TMI-1 and TMI-2. Results indicated one apparent deficiency and two apparent infractions for TMI-2.

Sincerely,


J. G. Herbein
Vice President-Generation

JGH:LWH:tas

Attachment

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Metropolitan Edison Company
Three Mile Island Nuclear Station
License Nos. DPR-50/DPR-73
Docket Nos. 50-289/50-320
Inspection Nos. 78-25 and 78-38

Based on the results of an NRC inspection on December 12-15, 1978, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your license as indicated below. Items A and C are infractions and Item B is a deficiency.

Infraction A

Appendix A to the License, in paragraph 6.8.1, states: "Written procedures shall be established, implemented, and maintained..."

Licensee Procedure AP-1034, in paragraph 6.3 states: "Should it become necessary to exceed the limits (of transient combustible material) for brief periods, the cognizant department head...must qualitatively evaluate any additional potential for temporary fire protection measures which must be taken in the area...while the limit...is exceeded, the area must be manned, or a fire watch patrol...at least once per hour be established."

Contrary to the above, empty cardboard boxes were stored in the cable spreading room, recording paper was stacked on temporary tables there, and a hot soldering iron was plugged into an outlet near the recording paper; however, the area was not manned nor had a fire watch patrol been established.

Response to Infraction A

Immediate corrective action taken in regards to Infraction A was as follows:

1. the soldering iron was unplugged and
2. the cardboard boxes were removed from the Cable Spreading Room.

These actions removed the potential fire hazard and placed us within the allowable limit for combustibles in the area.

Corrective action to avoid further items of noncompliance has been taken. All I&C Department personnel were advised that transient combustible materials in excess of the allowable amount for a specific area shall not be left unattended without the appropriate fire watch being established. Also, hot soldering irons shall not be left unattended. These actions are consistent with AP 1034.

Full compliance was achieved on January 30, 1979.

Deficiency B

Appendix A to the License, in paragraph 4.7.10.1.2(a)2, states: "Each fire pump diesel engine shall be demonstrated operable at least once per 31 days: ...The diesel starts from ambient conditions and operates for at least 20 minutes."

License Procedure AP-1010, in paragraph 6.6.1, states: "A retest is required when initial test results fail to meet the acceptance criteria or when the test could not be entirely performed. Retest results will be...evaluated, along with the original data sheets, by the Test Coordinator..."

Contrary to the above, a retest of steps 3.a, b, and c of Surveillance Report 3303-M1, dated September 18, 1978, was not performed when the initial test failed, and the test coordinator did not sign the front page of the surveillance report to indicate that he had evaluated the test results.

Response to Deficiency B

The diesel did not start in the Manual I position. However, it did start in Manual 2, where upon the operator performed the remainder of the surveillance test. Since T.S. 4.7.10.1.2(a)2 requires only that the diesel be started, not that both start circuits be operable, the test met acceptance criteria.

A test which meets acceptance criteria, even though one or more temporary malfunctions exist, requires no retest data or evaluation per AP 1010.

The inspector may have misunderstood the exception which existed (failure of the Manual 1 start circuit) for a deficiency.

A deficiency results from obtained data or conditions which fail to meet acceptance criteria (AP 1010,3.2.4.2).

The job ticket written to correct a deficiency must contain retest data, or such data must appear in the surveillance file. The GMS Coordinator must evaluate the retest data to make sure it meets acceptance criteria.

This requirement exists only when original data "...fail(s) to meet the acceptance criteria or when the test could not be entirely performed" (AP 1010, 3.3.1).

Since original data met acceptance criteria, and since the test was entirely performed, no deficiency existed which would require retest and evaluation.

An "exception" includes any irregularity or partial nonperformance of a surveillance test which exists yet still allows the test to meet acceptance criteria. This occurred during the 3303-MI performance in question.

Although one start circuit failed, the test yielded data which met acceptance criteria for the surveillance, since T.S. 4.7.10.1.2(a)2 requires only that the diesel start.

"The inspector noted that the September 18, 1978 issue of surveillance report 3303-M1 indicated a failure to completed steps 3.a, b, and c (the Manual I start function test for the fire pump diesel engine). Work Request No. 25237 was issued, which indicated that the diesel engine was repaired. However, it did not indicate that steps 3.a, b, and c were then satisfactorily performed".

Although a retest was not required, Work Request No. 25237, Step 13, "Post Maintenance Testing and Acceptance Criteria" states that the "diesel started in manual." The reviewing foreman checked "yes" under "Retest Met Acceptance Criteria".

Steps 3.a, b, and c of 3033-M1 require a manual start, a period of idling and a manual shut down. To satisfy acceptance criteria, the operator initials that these events occurred. These steps require no number data such as idle time or cranking RPM. Therefore, the statement that the "diesel starts in manual" satisfies acceptance criteria for a retest.

"The inspector noted that neither the shift supervisor nor the test coordinator had signed the front page of the September 18 report to indicate that they had evaluated the test result. He thereupon rechecked the surveillance report file, but did not find any retest report for the month of September."

No space occurs on any data sheet which may appropriately be signed by either the Shift Supervisor or the Test Coordinator. The "front page of the...report" exists solely as a computer entry device and does not constitute part of the surveillance test data. Signatures on this page are superfluous, since they appear on the actual data sheets.

"The inspector considered this contrary to the licensee's procedure AP-1010, "Technical Specification Surveillance Program," (Rev. 12) which states, in paragraph 6.6.1: "A retest is required when initial test results fail to meet the acceptance criteria or when the test could not be entirely performed. Retest results will be recorded on another set of data sheets or in the retest section of a Work Request. Retest results will be...evaluated, along with the original data sheets, by the Test Coordinator to determine that the surveillance requirement has been satisfied."

AP-1010 requires neither retest nor evaluation of retest data for exceptions. Therefore, we do not feel that Deficiency B is valid.

Infraction C

Attachment 2 to the License, in paragraph G.9, states: "By July 31, 1978: Provide additional fixed sealed-beam emergency lights to facilitate emergency operation at remote shutdown panels and facilities...".

Contrary to the above, additional emergency lights had not been installed in the cable-spreading room to facilitate emergency operation of the remote shutdown panel.

Response to Infraction C

In response to the above apparent infraction, Change Modification 2-0332 was generated to correct the location of the additional emergency lighting to an appropriate location that would provide lighting for the remote shutdown panels. This work was performed via Work Request No. C-0747. Full compliance was achieved on February 2, 1979. No further action is considered necessary.

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