

ENCLOSURE
DESCRIPTION OF VIOLATION

Metropolitan Edison Company
Docket No. 50-289
License No. DPR-50

Certain activities under your license appear to be in violation of AEC requirements. These violations are considered to be of Category II and Category III severity.

Category II Violations

1. 10 CFR 19.12 states in part: "All individuals working in or frequenting any portion of a restricted area...shall be instructed of their responsibility to report promptly to the licensee any condition which may lead to or cause a violation of Commission regulations and licenses or unnecessary exposure to radiation or radioactive material; ...and shall be advised as to the radiation exposure reports which workers may request pursuant to 19.13."

In violation of the above, all individuals working in or frequenting restricted areas were not instructed in their responsibilities to report conditions which could cause or lead to violations of Commission regulations; in that personnel questioned stated that such instruction has not been given, and that there was no documented training for such instruction.

2. Technical Specification 3.3.1.3.b states in part: "The sodium hydroxide tank shall contain not less than 16,000 pounds of sodium hydroxide and not more than 17,000 pounds of sodium hydroxide."

In violation of the above, the Sodium Hydroxide Tank was found to contain 17,677 pounds of sodium hydroxide during the routine surveillance test conducted on September 19, 1974. (AO 74-17, Letter to RO:I dated September 30, 1974)

We note that item 2 was reported to Regulatory as indicated above. Your corrective measures were reviewed during this inspection. We have no further questions on this matter at this time.

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Category III Violations

3. Criterion V of Appendix B to 10 CFR 50 and Section V of the licensee's Operational Quality Assurance Program both state in part: "Instructions, procedures, or drawings shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished."

In violation of the above, Emergency Procedure 1202-6 LOSS OF RC/RCS PRESSURE had inappropriate acceptance criteria for determining when sodium hydroxide addition had been satisfactorily accomplished; in that step 8 A (3) of the procedure indicated addition was complete and certain valves were to be repositioned when the sodium hydroxide tank reached "low level." "Low Level" was not quantitatively or qualitatively defined in the procedure nor indicated on the level instrumentation.

The inspector noted that your corrective action had been completed prior to the end of the inspection. We have no further questions on this matter at this time.

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