



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

November 18, 1977  
GQL 1526

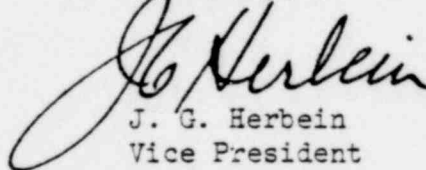
Mr. Eldon J. Brunner, Chief  
Reactor Operations & Nuclear Support Branch  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Three Mile Island Nuclear Station, Unit 1  
Operating License No. DPR-50  
Docket No. 50-289  
Inspection Report No. 77-32

This letter and the attachment are in response to your inspection letter of October 31, 1977, concerning Mr. T. Stetka's inspection of TMI-1 and the resultant finding of one apparent infraction.

Sincerely,

  
J. G. Herbein  
Vice President

JGH:DGM:tas

Attachment

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Metropolitan Edison Company  
Three Mile Island Nuclear Station Unit 1 (TMI-1)  
Docket No. 50-289  
License DPR-50  
Inspection Number 77-32

## RESPONSE TO APPARENT VIOLATION

### Apparent Infraction

Technical Specification 4.7.2.1 states "Whenever the control rod drive patch panel is locked (after inspection, test, reprogramming, or maintenance) each control rod drive mechanism shall be selected from the control room and exercised by a movement to two inches or less to verify that the proper rod has responded as shown on the unit computer printout of the rod or on the input to the computer for that rod."

Contrary to the above, on May 9, 1977, control rods were moved more than two inches (up to 10.7 inches) during the performance of procedure 1301-9.2, Control Rod Program - Special Check, that is used to meet the requirements of Technical Specification 4.7.2.

### Response to Apparent Violation

The control rods were moved more than 2 inches in violation of the limit stated in specification 4.7.2.1. The data in the inspection report, however, does not appear to be correct. The change in rod position for control rod 10-H was 6.4% (8.96 inches).

The test was done while the reactor was shutdown. Boron concentration in the reactor coolant system provided a shutdown margin of greater than 3%  $\Delta k/k$  even if all the control rods were withdrawn. The greater than 2 inches movement of the control rods did not result in any threat to the health and safety of the public or result in any unsafe condition.

Since the intent of the test is to demonstrate that the correct rod responds, the intent of the test was satisfied by the May 9th test and it has been determined that retest is not necessary.

The surveillance test is normally done during shutdown but even if done at power the 2 inches limit is unnecessarily restrictive. Movement of less than 2 inches is difficult to reliably observe on absolute position indication since the nominal increments in rod position are 1.48 inches. A Technical Specification Change Request will be submitted upon completion of the in-house review. This change will allow movement of 2% of the rod length. This will permit a more reliable observation of the position.

To avoid further items of noncompliance a Temporary Change Notice has been initiated to SP 1301-9.2 to limit movement to less than 2 inches. Full compliance was achieved 10/20/77.

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