

METROPOLITAN EDISON COMPANY

OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

September 16, 1975
GQL 1496

Mr. J. P. O'Reilly
Office of Inspection and Enforcement, Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

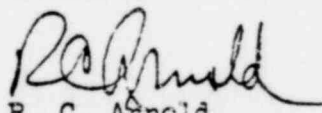
Dear Mr. O'Reilly:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License #DPR-50
Docket No. 50-289
Inspection #75-16

This letter and accompanying enclosure are in response to your inspection letter of August 14, 1975, concerning Mr. R. J. Everett's inspection of TMI-1 and the results of that inspection.

Please note that this response is being submitted six days late as agreed upon in our telephone conversation of September 10, 1975.

Sincerely,


R. C. Arnold
Vice President

RCA:CWS:tas

Enclosure: Response to Apparent Violation

File: 7.7.3.2.1

1452 005

7910190

551

ENCLOSURE

Metropolitan Edison Company (Met-Ed)
Three Mile Island Nuclear Station (TMI)
Docket No. 50-289
License No. DPR-50
Inspection No. 50-289/75-16

POOR ORIGINAL

Response to Description of Apparent Violation

Apparent Violation

Contrary to Technical Specification, Section 2.3.1.b, the liquid gross activity monitor RM-L6 was not set to alarm and automatically close the waste discharge valve WDL-V-257 prior to exceeding the limits specified in 10 CFR Part 20, Appendix B for unrestricted areas, as the alarm setting was too high.

Response

The alarm setpoint was maintained at a level based on the Technical Specification limit of 10 curies per effluent tank. A lower level alarm setpoint based on the most restrictive isotope for this application listed in 10 CFR 20 was considered impractical due to repeated high contamination levels in the RM-L6 sample chamber and the RM-L6 instrument low scale detectable level. RM-L6 sensitivity range is from $1.4E-6$ uCi/cc to $1.4E-2$ uCi/cc based on Cs137 assuming a 200 cpm background. Corrective action to date has included the installation of a new type sampler with a replaceable liner for RM-L6, submittal of an engineering design change to allow sample chamber flushing capability, submittal of a design change to the control room monitor rate meter to allow a variable alarm setpoint, proposed procedural changes to incorporate the use of the above modifications. I would like to point out that the alarm setpoint of RM-L6 only applies during the release of liquid radioactive waste.

It is anticipated that the aforementioned changes will be installed and incorporated by October 15, 1975. At that time, it is felt that the capability will exist to maintain RM-L6 background sufficiently low and concurrently use a variable alarm setpoint to take credit for minimum available dilution. These modifications will insure compliance with Section 2.3.1.b of the Technical Specifications.

It should be noted that prior to any discharge from the subject effluent tanks samples were taken to ensure that all of the discharge concentration limits of 10 CFR 20 and the Technical Specifications were met, and these types of samples will continue to be taken until such time as the above described modifications are implemented.

1452 006