

METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

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April 12, 1977 GQL 0469

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:

Docket No. 50-289 Operation License No. DPR-50 Three Mile Island Nuclear Station, Unit 1 (TMI-1) Inspection Report No. 50-289/77-05

This letter and the enclosure are in response to you, inspection letter of March 23, 1977, concerning Mr. A. Fasano's inspection of TMI-1 and the resultant finding of the apparent deficiency.

Sincerely,

Vice President

RCA:DGM:eg

Enclosure: Inspection Report Finding

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Metropolitan Edison Company Three Mile Island Nuclear Station Docket No. 50-289 License No. DPR-50 Inspection No. 77-05

## Apparent Violation A Unit 1

10 CFR 50, Appendix B, Criterion XVI states in part, "Measures shall be established to assure that conditions adverse to quality... are promptly identified and corrected". The accepted Operational Quality Assurance Plan (FSAR Appendix 1A) Section 6.7 states in part: "The Station Superintendent is directly responsible for... insuring that conditions adverse to quality, when identified, are corrected for all activities involving operations, maintenance, repair, refueling, testing, and site engineering."

Contrary to the above, the corrective action delineated in Metropolitan Edison Company response letters to NRC:I Enforcement Correspondence dated May 28, 1976 (Inspection No. 76-11) and August 27, 1976 (Inspection No. 76-19) had not been completed as of February 25, 1977. Specifically, for Inspection No. 76-11, administrative procedures were to specify the review frequency for operational procedures and the mechanisms to insure these reviews were to be in effect by November 24, 1976, and for Inspection No. 76-19, all Maintenance Department personnel whose work could involve lifting leads or placing jumpers were to be trained or retrained in the requirements and responsibilities imposed by Administrative Procedure 1013 by November 1, 1976.

## Response to Apparent Violation A

(Inspection Report No. 76-11) A change to Administrative Procedure AP 1001, Document Control, which specifies the review frequency for safety-related operational procedures, has been approved. The revised procedure will be typed and distributed by April 15, 1977. The system to ensure periodic review of safety-related procedures as specified in the revised AP 1001, will be in effect by May 16, 1977.

(Inspection Report No. 76-19) All Maintenance Department personnel, whose work could involve lifting leads or placing jumpers, have been trained or retrained, as applicable, in the requirements and responsibilities imposed by AP 1013, Bypass of Safety Functions and Jumper Control. Therefore, we are now in full compliance concerning this item.

The Unit Superintendent and PORC Chairman met shortly after the NRC Inspection No. 77-05 exit interview to discuss the problem of untimely corrective action. As a result of this meeting, the PORC Chairman revised the action item tracking system. The status of all items will be formally reviewed weekly. Any item approaching its due date will receive additional attention. If for some reason a due date will not be met, the NRC will be notified and a new due date will be given.

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