



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

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January 28, 1977
GQL 0030

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 I (TMI-1)
Docket No. 50-289
Operation License No. DPR-50
Inspection Report No. 50-289/76-26

This letter and the attached enclosure are in response to your inspection letter of December 21, 1976, concerning Mr. K. Plumlee's inspection of TMI-1 and the resultant finding of these apparent violations.

Sincerely,

R. C. Arnold
Vice President

RCA:DGM:daf

Enclosure

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Metropolitan Edison Company
Three Mile Island Nuclear Station Unit 1 (TMI-1)
Docket No. 50-289
License No. DPR-50
Inspection No. 76-26

RESPONSE TO DESCRIPTION OF APPARENT VIOLATION

Management Controls That Prevent Recurrences

For all apparent violations, the cognizant Department Head reviews the circumstances surrounding the particular item of noncompliance. The Department Head discusses the apparent violations with key members of his staff and then with the PORC. Recommendations are made to the Unit Superintendent in the way of corrective measures to prevent this type of noncompliance in the future. Recommendations have been made in the areas of training, procedural changes, design changes, and counseling of individuals involved with a particular item of noncompliance.

For items of noncompliance which have occurred previously, as in the case of apparent violations A and B, a review occurs to determine why the corrective action that was previously implemented did not prevent another occurrence. If the initial corrective action is thought to be the best possible solution it is again implemented. However, as done for the apparent violations in the inspection report, additional corrective action, as described in each response, was implemented.

Apparent Violation A:

10 CFR 20.203 (b) "Caution signs, labels, signals and controls" requires that such radiation area be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words "CAUTION RADIATION AREA".

Contrary to this requirement, an area accessible to personnel in which a radiation level of 15 mrem/hr was measured near the precoat recirculation piping was not posted as a radiation area when inspected on November 16, 1976. This item is recurrent in that similar items of noncompliance were brought to your attention in letters dated April 9, 1975, and August 2, 1976.

Response to Apparent Violation A :

The area in question had been surveyed by a radiation protection technician approximately three hours prior to the inspection and found to be less than 5 mrem/hr. Subsequent to the survey, a reactor coolant bleed tank had been placed on recirculation through the precoat filters, causing the 15 mrem/hr level discovered during the inspection. A memorandum has been distributed detailing the need for cooperation and communication between the Operations, Maintenance and Health Physics Department regarding plant operations and maintenance activities which can cause variations in radiation levels. The area in question has been permanently posted and roped off as an intermittent radiation area and as such, requires a radiation work permit prior to entry, and full compliance has been achieved. Additionally, as operating or maintenance evolutions are identified which can cause variations in radiation levels, procedural changes will be made to insure the notification of the Radiation Protection Department to insure proper radiation surveys are performed.

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Apparent Violation B:

Technical Specification Section 6.11 requires adherence to procedures for all operations involving personnel radiation exposures, and Health Physics Procedure 1749 requires quarterly calibrations of PAC-4S survey instruments, plus or minus 1½ weeks.

Contrary to the above, two PAC-4S survey instruments were identified on November 19, 1976, Serial Nos. 1357 and 2752, that were available for use and had not been calibrated since July 14, 1976, and were more than three weeks overdue for calibration. This item is recurrent in that similar items of noncompliance were brought to your attention in letters dated April 20 and September 21, 1976.

Response to Apparent Violation B:

Upon completion of the calibration procedure for the two PAC-4S survey instruments on July 14, 1976, the radiation protection technician involved inadvertently added four months rather than three to determine the new due date for compliance with the quarterly calibration requirement. This produced a due date of November 14, 1976 with a late date of November 25, 1976. This entry was the first into the new computer based tracking system, which uses a computer to automatically add the correct time interval to compute the new calibration due date. Both PAC-4S survey instruments have been calibrated and we are now in full compliance.

Apparent Violation C:

10 CFR 30.41 (c) "Transfer of byproduct material" requires that before transferring byproduct material the licensee transferring the material shall verify that the transferee's license authorized the receipt of the type, form, and quantity of byproduct material to be transferred.

Contrary to this requirement, a pump was shipped on April 6, 1976, to a repair shop and the transferee's license did not authorize the receipt or possession of the byproduct materials present in the shipment.

Response to Apparent Violation C:

Station Health Physics Procedure 1618 "Shipment of Radioactive Materials, DOT Regulations, has been revised to include the requirement that the license of the recipient be reviewed by a radiation protection supervisors prior to signing the shipping form, and we are now in full compliance. Additionally, instruction has been given to all radiation protection supervisors regarding the need to review completely the recipient's license to insure that they may receive the type and quantity of material being shipped and that a current license is maintained on file at Three Mile Island.

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