



METROPOLITAN EDISON COMPANY

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July 15, 1974
CQL 0158

Eldon J. Brunner, Chief
Reactor Operations Branch
Directorate of Regulatory Operations, Region 1
U. S. Atomic Energy Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Operating License No. DPR-50
Inspection No. 50-289/74-25

This letter and the attached enclosure are in response to your inspection report letter of June 21, 1974, concerning Mr. Spessard's June 3-6, 1974, inspection of Three Mile Island Nuclear Station, Unit 1 and the findings thereof.

Sincerely,


R. C. Arnold
Vice President

RCA:DMG:lw
Enclosure: Response to Description
of Apparent Violations

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ENCLOSURE

Metropolitan Edison Company
Three Mile Island Nuclear Station, Unit 1
Operating License No. DFR-50
Inspection No. 50-289/74-25

Response to Description of Apparent Violations

Apparent Violation 1

1. The FSAR Section 1A, Operating Quality Assurance Plan, Section VI, Document Control, states in part: "...The Generation Division document control procedure further requires that each Manager and Station Superintendent provide in their procedures for measures: ...to ensure that approved changes be promptly transmitted for incorporation into documents; and to ensure that obsolete or superseded documents are eliminated from the system and not used..."

Contrary to the above:

- a. On June 4, 1974, the Makeup and Purification System was being lined up during preparations for initial criticality with the Control Room Working Copy of OP 1104-2 Revision 1, although the Control Room File Copy of OP 1104-2 was Revision 2. The effective revision of this procedure was Revision 3 which had been distributed on May 24, 1974.
- b. On May 30, 1974, the Decay Heat Removal System was lined up during preparations for initial criticality in accordance with OP 1104-4. The valves were positioned to the valve checklist, Enclosure I, Revision 1. The correct revision of Enclosure I was Revision 2, dated Apr. 27, 1974.

In both of these instances, the differences between the superseded and revised procedures included the following: 1) Valves being added to the list of things to be checked; 2) Valve positions being changed from open to closed and vice versa; and 3) Valve status being changed from "closed" to "locked closed", etc.

Response:

- a. A comparison of current and previous editions of procedures used to align all safety related systems during preparations for initial criticality was made and:
 1. No unsafe conditions were found to exist as a result of having used several outdated editions, and
 2. improperly positioned valves were repositioned in accordance with the current checklists.
- b. To avoid future violations of this type:
 1. a complete audit of all procedure files was conducted and included
 - (a) replacing outdated procedures with current editions, and

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- (b) destroying spare copies of valve checklists,
- 2. It has been decided to conduct future audits of this same type on a periodic basis, and
- 3. a memo has been written to
 - (a) define those individuals responsible for maintaining up-to-date procedure files and
 - (b) reiterate to operations personnel the importance of assuring they use only current procedures.
- c. All the above corrective actions were also reported in abnormal occurrence report AO 50-289/74-7, dated June 14, 1974; and as noted therein full compliance was achieved by that date.

Apparent Violation 2

The FSAR Section 1A, Operating Quality Assurance Plan, Section VI, Document Control states in part: "...The Superintendent of the TMI Station Unit 1 will ensure that no changes are made to site instructions, procedures, and drawings unless such changes are approved by the appropriate approving organization..."

Contrary to the above, the Waste Gas Disposal System was lined up during preparations for initial criticality in accordance with OP 1104-27. The Control Room Working Copy of this procedure had changes to valve, level indicator and electrical panel designators on Pages 5 and 6 without any approval indicated.

Response:

- a. Immediate investigation of the differences between the Control Room Working Copy of OP 1104-27 and the current copy resulted in the conclusion that no unsafe conditions existed. Further investigation into why no approving signature appeared on the Control Room Working Copy revealed that a Temporary Change Notice (TCN) had been requested, but that it had not yet been approved. The requested TCN was then reviewed and approved.
- b. To avoid future violations of this type all shift supervisors and reactor operators were instructed in the proper method for making changes to procedures.
- c. Full compliance has been achieved.

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