



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

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TELEPHONE 215 - 929-3601

September 21, 1976  
GQL 1318

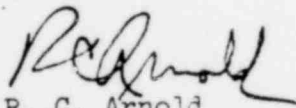
Mr. Eldon J. Brunner, Chief  
Reactor Operations & Nuclear Support Branch  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Mr. Brunner:

Docket No. 50-289  
Operation License No. DPR-50  
Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Inspection Report No. 50-289/76-19

This letter and the attached enclosure are in response to your inspection letter of August 2, 1976, concerning Mr. W. Ruhlman's inspection of TMI-1 and the resultant finding of an apparent violation. This is being submitted late pursuant to the September 17, 1976 telephone conversation between Mr. Ruhlman and our Mr. W. E. Potts.

Sincerely,

  
R. C. Arnold  
Vice President

RCA:JJM: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. 76-19

RESPONSE TO DESCRIPTION OF APPARENT VIOLATION

APPARENT VIOLATION A

10 CFR 20.203 (b) states: "Radiation areas. Each radiation area shall be conspicuously posted with a sign or signs bearing the radiation caution symbol and the words: CAUTION RADIATION AREA." Health Physics Procedure 1610, ESTABLISHING AND POSTING AREAS, Revision 4, dated July 28, 1976, Paragraph 5.1.2 states: " 'Radiation Areas' will be posted with caution signs, acceptable to the AEC, that read: 'Caution' RADIATION AREA."

Contrary to the above, the radiation area at the entrance to the Drum Storage Area near the 1 CES Switchboard was posted as a High Radiation Area when, in fact, it was a Radiation Area.

Prior to the completion of the inspection, the area was surveyed, verified as a Radiation Area, and the posting was changed to reflect the actual conditions. This corrective action was verified by the inspector.

RESPONSE TO APPARENT VIOLATION A

In the future, Met-Ed will not make a practice of posting as "High Radiation Areas" areas whose radiation levels vary between those constituting a "High Radiation Area" and those constituting a "Radiation Area". Such areas will be posted as surveys indicate, and care will be taken to insure that posting is changed as required when the factors affecting the radiation level of the area are changed.

APPARENT VIOLATION B

Technical Specification 6.8.1 states in part: "Written procedures and administrative policies shall be established, implemented and maintained..." Unit 1 Administrative Procedure AP 1013, BYPASSING OF SAFETY FUNCTIONS AND JUMPER CONTROL, Revision 3, dated July 17, 1974, Paragraph D.2.e, states in part: "Whenever the leads are replaced the following information shall be entered in the log: Date-Time-Replaced By."

Contrary to the above, Administrative Procedure 1013 was not implemented in that two leads, controlled by lifted lead tags #27 and #28, had been replaced without filling in the required information in the log.

This item was identified and documented by the licensee on NCR TMI 76-372. However, corrective actions to prevent recurrence were neither defined nor implemented nor was this specific deficiency corrected. Therefore, a response to this item is required. Your response should address also those actions you plan to take to ensure that operating staff are informed promptly of deficiencies identified through internal audits and surveillance.

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RESPONSE TO APPARENT VIOLATION B

The cause of this deficiency was determined to be personnel being unfamiliar with the requirements of Procedure AP 1013. To correct this, all Maintenance Department personnel whose work could involve lifting leads or placing jumpers will be trained or retrained in the requirements and responsibilities imposed by Administrative Procedure 1013. This training will be completed by 1 November 1976.

The time taken to correct the condition identified by the internal audit was excessive. The Supervisor of Operations will assure prompt action is taken to correct those deficiencies.

The NCR #76-372 action was completed on 13 August 1976 and the NCR officially closed out on 27 August 1976.

We are now in compliance.

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