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July 21, 1978 GQL 1249

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 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inspection Report No. 78-14

This letter and the attachment are in response to your inspection letter of July 7, 1978, concerning Mr. Cante's inspection of TMI-1 and the resultant finding of one apparent infraction.

Sincerely,

J. G. Herbein

Vice President-Generation

JGH:DGM:cjg

Attachment

Metropolitan Edison Company
Three Mile Island Nuclear Station Unit 1
Docket No. 50-289
License No. DPR-50
Inspection No. 78-14

Apparent Violation

Technical Specification 6.8.1 states in part, "Written procedures and administrative policies shall be established, implemented and maintained that meet or exceed the requirements and recommendations of Section 5.1 and 5.3 of ANSI N18.7-1972..."

ANSI N18.7-1972, Section 5.1.2 requires administrative policies relating to procedure adherence and procedure changes.

Contrary to the above, Station Administrative policies were not adhered to on four occasions during the period April 26, 1978 to May 20, 1978 in that no procedure change was initiated to document the steps actually performed to satisfy a technical specification surveillance requirement. Surveillance Procedure 1303-3.1, Control Rod Movement, Step 6.10 could not be performed as specified by the procedure due to a change in rod insertion limits imposed following the last refueling which ended April 26, 1978.

Response to Apparent Violation

The Surveillance Procedure 1303-3.1 has been reviewed and the necessary procedure changes have been issued. Other procedures that could have been affected by the last Refueling Outage have been reviewed. No other procedure problems were found.

All Operators were counselled on the need to initiate procedure changes when they are required. Full compliance was achieved as of July 18, 1973.