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March 25, 1980

TLL 118

Office of Inspection and Enforcement
Attn: Mr. B. H. Grier, Director
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
IE Bulletin 80-03

This letter is in response to your letter dated February 6, 1980, concerning the loss of charcoal from tray adsorber cells. Below are listed your items and our responses.

ITEM

1. Determine if charcoal adsorber cells in use, or proposed for use, have the potential for a loss of charcoal incidental to handling, storage or use (as appropriate). Particular attention should be directed to examination of a) rivet spacing resulting in separation of screen and cell housing and b) adsorber cell or filter housing deformation causing loss of charcoal and/or channeling. Either of these items could result in a degraded filtration system incapable of performing its intended function. The preferred method of this determination is a visual inspection of the filter housing and adsorber cells as described in Section 5 of ANSI N510-1975. If this method is not feasible, state in the report required by Paragraph 4 how the determination was made.

RESPONSE

1. Charcoal cells were observed for rivet spacing, cell integrity, cell and cell housing deformation, and screen/casing separation. No anomalies were found. Rivet spacing on the inspection plates of the cells (3.5 inches) provides adequate support to prevent loss of charcoal. The TMI-I charcoal adsorber cells were manufactured by MSA in 1975 and their design is a flat bed carbon cell, two (2) inches deep. The three (3) systems using cells of this type are the Reactor Building Purge System, the Auxiliary and Fuel Handling Building Exhaust System and the Control Room Emergency Ventilation System. The charcoal cells, both the upstream and downstream sides were visually inspected in place using a flashlight in addition to the existing light to search for voids.

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2. For ESF filtration systems, any identified defective cells shall be replaced and the operability of the system (after cell replacement) demonstrated by leak testing within 7 days. Preferred method of leak testing is as described in Regulatory Guide 1.52 and Section 12 of ANSI N510-1975.

RESPONSE

2. No defective cells were found.

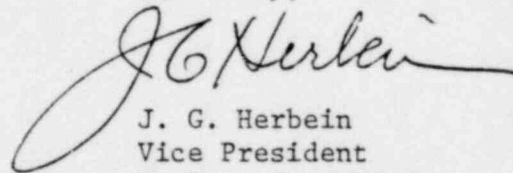
ITEM

3. For normal ventilation exhaust filtration systems which employ charcoal adsorber cells and for which radioactive removal efficiency has been assumed in determining compliance with the "as low as reasonably achievable" design criteria of 10 CFR 50, Appendix I, any identified defective cells shall be replaced as soon as possible but at least within 30 days. After replacement, the system should be demonstrated operable by leak testing within an additional 30 days. Preferred method of testing is as described in Regulatory Guide 1.140 and Section 12 of ANSI N510-1975.

RESPONSE

3. No defective cells were found.

Sincerely,



J. G. Herbein
Vice President
Nuclear Operations

JGH:DGM:hah

cc: J. T. Collins
R. H. Vollmer