



**PUBLIC
SERVICE
INDIANA**

March 10, 1980

S. W. Shields
Vice President - Electric System

Mr. Gaston Fiorelli
U.S. Nuclear Regulatory Commission
Region III
799 Roosevelt Road
Glen Ellyn, IL 60137

Docket Nos.: STN 50-546
STN 50-547

Dear Mr. Fiorelli:

SUBJECT: Marble Hill Nuclear Generating Station - Units 1 and 2

In accordance with the provisions of Section 2.201 of the NRC's "Rules of Practice", Part 2, Title 10, Code of Federal Regulations, Public Service Company of Indiana, Inc. (PSI) offers the following additional information in response to the noncompliances contained in Inspection Report 50-546/79-25; 50-547/79-25. This additional information is provided to fulfill the verbal request of Mr. J. J. Harrison for additional information by March 10, 1980.

Item of Noncompliance (50-546/79-25-01-b and 50-547/79-25-01-b)

Marble Hill PSAR, Chapter 1, Section 1.7 commits to the intent of Regulatory Guide 1.38 (March 16, 1978) and therefore to ANSI N45.2.2 (1972) Section 6 which states in part that levels and methods of storage necessary are defined to minimize the possibility of damage or lowering of quality due to corrosion, contamination, deterioration or physical damage from the time an item is stored upon receipt until the item is removed from storage and placed in its final location. And that items released from storage and placed in their final locations within the power plant, shall be inspected and cared for in accordance with the requirements of the section of this standard, and other applicable standards. The Marble Hill Nuclear Generating Station Construction Management Manual Procedure 4.2 addresses the requirements of ANSI N45.2 regarding storage, maintenance and handling.

Contrary to the above, PSI has not sufficiently implemented its material control program related specifically to storage and maintenance at the Marble Hill plant site. The following items are examples of those detailed in this report.

- b. Improper/inadequate maintenance of material; (1) several steam generator maintenance records and actual pressure readings were below the minimum and above the maximum recommended by the Nuclear Steam

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System supplier. (2) The neutron detector positioning device assembly requires periodic maintenance at receipt and yearly thereafter by the manufacturer. This assembly has been on-site for over eighteen (18) months; however, no maintenance has been performed.

Corrective Action Taken and Results Achieved

As reported in PSI letter of February 15, 1980 (PSI No. 0226805026), material maintenance deficiencies were documented on a Corrective Action Report to assure evaluation and verification of corrective actions taken. Below is a description of the actions taken:

1. Custody of the neutron positioning device was transferred to Commonwealth-Lord (CECo). The device was moved into the CECO warehouse, the required maintenance inspection performed, and a Corrective Action Request originated to assure correction of deficiencies discovered.
2. Proper purge maintenance on the steam generators and pressurizer has been in effect since late November 1979 by Cherne. Dew point measurements were taken by Cherne November 27, 1979 and transmitted to PSI. Routine maintenance requirements have been established and are being complied with regularly by Cherne.
3. The protective coating on the four steam generators, (Unit 1), two reactor vessels, (Units 1 and 2), and one pressurizer (Unit 1) were properly repaired prior to November 28, 1979, and inaccessible surface areas were adequately sealed to prevent further corrosion. Routine maintenance surveillances by Cherne personnel of surface protection are in effect. Routine maintenance inspections of the reactor vessels are being performed by PSI. Nuclear Installation Services Company (NISCO) has been assigned maintenance scope of the reactor vessels and will perform this function in the future.
4. The desiccator plug humidity indicators for Unit 1 and 2 reactor vessels were changed on February 6, 1980 and new dessicant installed in both Unit 1 and Unit 2 reactor vessels. Additionally one (1) contractor (NISCO) has been assigned the storage and maintenance scope for these components, detailed manufacturer's procedures have been transmitted to them, review meetings held, and a physical detailed reinspection of both vessels has been completed. Routine maintenance procedures will be conducted as required in the future.
5. The following actions were taken to eliminate potential moisture damage conditions:



- a. Reactor coolant loop stop valves and main steam isolation valves have been moved indoors, uncrated as necessary, and dried out. PSI surveillance indicated the storage area meets all applicable Level B standards with the exception of housekeeping requirements. A Corrective Action Report has been originated by PSI to upgrade the housekeeping of the storage area to Level B requirements.
- b. The eight residual heat removal coolers located in the fuel handling building (elevation 346') have energized space heaters, the units have been blocked on dunnage and have been verified dry.
6. PSI has determined that maintenance records for the nitrogen purge on the let-down heat exchangers for Units 1 and 2 were being maintained in a Cherne master log located in the warehouse but the records located on the equipment were not updated. To avoid confusion and assure a complete and reliable record is maintained, Cherne has discontinued the practice of maintaining dual sets of records and will maintain one master set.
7. The missing cap on the volume control tank has been replaced and unsealed caps on the volume control tank and reactor coolant drain tank have been sealed. PSI and Cherne are also increasing the amount of Quality Assurance surveillance of storage areas to promptly identify on going problems of this type.
8. The nuts, bolts and studs of the volume control tank and the residual heat removal heat exchangers which were found to require maintenance have been cleaned and recoated with Mobil Arma 245 per the manufacturer's recommendations. A PSI Corrective Action Request has been originated to assure Cherne adequately maintains the chemical and volume control heat exchangers and to assure Cherne reviews all nuts, bolts and studs on items in Cherne storage and performs maintenance as required. Additional Cherne and PSI surveillance has been established to identify and disposition these type items more promptly.

Corrective Action Taken to Prevent Recurrence

The same as reported in PSI letter dated February 15, 1980.

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Mr. G. Fiorelli


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Date When Full Compliance Will be Achieved

The same as reported in PSI letter dated February 15, 1980.

Sincerely,



S. W. SHIELDS
Vice President -
Electric System

CEC/dks

cc: J.J. Harrison
E.R. Schweibinz, P.E.