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Writer's Direct Dial Number

April 11, 1980
TLL 168

Director of Nuclear Reactor Regulation
Attn: R. W. Reid, Chief
Operating Reactors Branch No. 4
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

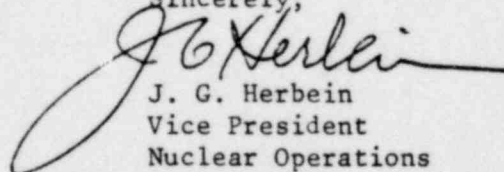
Dear Sir:

Three Mile Island Nuclear Station Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inservice Inspection Program

By letter dated October 26, 1979, we submitted a proposed inservice inspection program description with exceptions regarding selected ASME Code requirements pursuant to 10CFR50.55 a(g). You had not completed your detailed review of our submittal when we initiated the current inservice inspection (ISI) activities. The current activities are proceeding by telecon approval with the contingency that we employ the submitted ISI Program and maintain those portions of the original ISI Program that contain more stringent requirements. The ISI Program as submitted implements those ASME Code requirements that are considered practical. The new program increases the scope of inservice inspection beyond that currently required by our Technical Specifications. We believe that the upgraded ISI Program as submitted will further enhance safety.

It becomes apparent after implementing the new ISI Program that we must clarify our position regarding the upgrade of existing ultrasonic (UT) nondestructive examination techniques and related procedures. Procedure changes implemented with the new program incorporate later Code requirements to add beam angle scans, reduce recording/reporting levels, add acceptance criteria and control of equipment. We completed the UT procedure upgrade without replacing the existing calibration standards. Consequently some standards are not configured as shown in the appropriate Code Articles. None of the existing calibration standard configurations preclude the ability to achieve an acceptable UT system calibration. We have reworked some UT standards to improve quality. We are committed to replace standards on the basis of other technical considerations including state-of-the-art improvements and loss or damage through normal deterioration. Replacing calibration standards on the basis that they are not configured like those required by Code would result in hardships or unusual difficulties without any increase in the level of quality or safety.

Sincerely,


J. G. Herbein
Vice President
Nuclear Operations

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JGH: CDC: jaa
cc: J. T. Collins

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