



Metropolitan Edison Company
Post Office Box 480
Middletown, Pennsylvania 17057
717 944-4041

Writer's Direct Dial Number

July 3, 1980
TLL 315

Office of Inspection and Enforcement
Attn: 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 80-12

We have reviewed the events which occurred at Davis-Besse, and have reviewed the hardware capability of TMI-I to prevent a Decay Heat Removal (DHR) loss event. Additionally, we have analyzed our procedures for adequacy of safeguarding against loss of redundancy and diversity of DHR capability and adequacy of responding to DHR loss events.

As a result of these reviews and analysis the following procedure changes have been initiated.

- 1) Operating Procedure 1104-4. "Decay Heat Removal System" will be modified to provide additional administrative control over the position of DH-V6A/B (Reactor Building Sump Isolation Vavles). During cold shutdown and refueling shutdown conditions DH-V6A/B (except during testing) will be tagged closed with their breakers open to prevent inadvertent opening and potential draining of the Borated Water Storage Tank to the Reactor Building sump.
- 2) Maintenance Procedure 1401-4.4. "Removal and Replacement of Manway and Inspection Covers of the Once Through Steam Generator" will be modified to include the need to evaluate the DHR capabilities of other plant systems prior to removing any manways or inspection covers (on the primary or secondary side) from the OTSG's. This evaluation will consider the value of decay heat generation in the core, the Reactor Coolant System heatup rate if DHR is lost, redundancy requirements of the DHR trains, and alternate DHR schemes should the DHR Systems become inoperable.

These procedures will be modified by July 31, 1980.

The daily logs, weekly and monthly surveillances monitor the performance capabilities of the DHR systems. Discrepancies detected by these surveillances

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TMI-I BCC LIST

Mrs. Pat Higgins
Edison Electric Institute
1111 19th Street, NW
Washington, D.C. 20555

Mr. E. L. Blake, Jr.
Shaw, Pittman, Potts & Trowbridge
1800 "M" Street, NW
Washington, D.C. 20555

Mr. R. Sancore
American Nuclear Insurers
The Exchange - Suite 245
270 Farmington Avenue
Farmington, CT 06032



G. J. Troffer - TMI Trlr. 198
G. K. Hovey - TMI Trlr. 105
P. Clark - GPUSC Parsippany
R. Fenti - TMI - QA Trlr. 22
M. J. Ross - TMI - Ops. #1
L. W. Harding - TMI Licensing
R. M. Klingaman - Met-Ed Reading
N. Kazanas - Parsippany - QA
J. F. Wilson - TMI Trlr. 14
J. J. Colitz - TMI-I
B. Ballard - TMI Trlr. 16
G. P. Miller - TMI-I
R. C. Arnold - TMI - Trlr. 201
D. G. Mitchell - Met-Ed Reading
R. Koef - Training manager

File: 02.0016.0001.0001.02

Mr. S. H. Duerson
Babcock & Wilcox
P.O. Box 1260
Lynchburg, VA 24505

Mr. T. F. Hartley, Jr.
Marsh & McLennan, Inc.
1221 Avenue of the Americas
New York, NY 10020

Ms. Margaret Reilly
Chief Div. of Reactor Review
PA Department of Environmental Resources
Fulton Bank Building
Harrisburg, PA 17120

B. A. Hockley - Discovery Room Crawford Station
S. D. Chaplin - TMI Licensing
R. J. Toole - TMI-I Supervisor
R. F. Wilson - TMI Trlr. 105
W. N. Moreau - Met-Ed Reading
C. W. Smyth - Parsippany Licensing
E. G. Wallace - Parsippany Licensing
W. E. Potts - TMI - Radiation Control - 1
A. Bell - TMI GORB Secretary - Parsip.
M. Nelson - Trlr. 60
M. A. Shatto - TMI-I PORC Secretary - Eng. #
G. A. Kunder - TMI-II PORC Chairman - Trlr. 1
W. F. Schmauss - TMI-I GRC Chairman - Parsip
J. Thiesing - Bechtel Room #201 Admin Bldg.
P. S. Walsh - GPU Parsippany
D. Smith - Reading - Production Supervision
J. T. Collins - NRC Trlr. #1
R. A. Lengel - Engineers #1

M. Ross -
H. B. Shipman

are corrected by means of the Corrective Maintenance Program. This combination is adequate to guard against DHR degradation and assess the DHR adequacy.

Sincerely,

Signed J. G. Herbein

J. G. Herbein
Vice President
TMI-I

JGH:DGM:lma

Attachment

cc: Director
Division of Operations Inspection
NRC Office of Inspection and Enforcement
Washington, D.C. 20555

J. T. Collins
B. J. Snyder
H. Silver
R. W. Reid
D. DiIanni

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
AND
PENNSYLVANIA ELECTRIC COMPANY
THREE MILE ISLAND NUCLEAR STATION, UNIT 1

Operating License No. DPR-50
Docket No. 50-289

This letter is submitted in support of the Nuclear Regulatory Commission request concerning the May 7, 1980 letter transmitting IE Bulletin 80-12. The responses to items 7a and b of the subject letter are attached. Further, all statements contained in these responses have been reviewed and all such statements made and matters set forth therein are true and correct to the best of my knowledge, information and belief.

By /s/ J. G. Herbein
Vice President

Sworn and subscribed to me this 1 day of July , 1980.

By Cathy L. Gray
Notary Public

C. L. GRAY, Notary Public
1000 Liberty Bldg., Dauphin County, Pa.
My Commission Expires Oct. 24, 1983