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July 10, 1980  
TLL 331

Office of Inspection and Enforcement  
Attn: Mr. Victor Stello, Director  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit II (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
Review of Recovery Mode Surveillance Procedures

This letter is submitted pursuant to our commitment in item 1 of TLL 158, dated May 19, 1980, "Response to Items of Noncompliance".

The Unit II Recovery Operations Plan Surveillance Procedures approved for use, were reviewed to assure that Technical Specification requirements were properly implemented and especially to assure that appropriate controls are set up to return systems or components to service at the conclusion of surveillance activities.

Attached is the list of procedures reviewed and the results of their review. In summary, sufficient administrative controls to assure Technical Specification compliance were present in all but one of the procedures. One procedure (SP4303-M3) needs to have ambiguous return to service requirements strengthened. This will be accomplished by August 31, 1980.

Sincerely,

R. C. Arnold  
Senior Vice-President

RCA:SDC:dad

Attachment

cc: J. T. Collins  
B. H. Grier

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PROCEDURE #	TITLE	METHOD USED TO ASSURE COMPONENT/SYSTEM IS RETURNED TO SERVICE.
4303-M16 A/B/C/D	Emergency Diesel Operability Test	This test involves manually running the diesels and specific steps assure they are lined up for automatic standby emergency operation at the conclusion of the test
4303-M15	Control Room Emergency Ventilation System	This test involves no removal of equipment from service
4303-	Chlorine Detector System	This test involves no removal of equipment from services; however, ventilation is transferred from the normal fans to the bypass fans and back again
4303-M5	Intermediate Range Channel	A specific step assures that the module is returned from the TEST to OPERATE mode at the conclusion of the test
4303-M3	Standby RCS Pressure Control System Isolation Valve Test	This test involves temporary isolation of the SPC system by test closure of SPC-V71. This procedure does not clearly document that the valve is reopened and therefore a procedure change will be implemented by 8/30/80 to resolve this
4302-R32	Radiation Monitoring System Calibration	Specific steps assure all channels of the monitors are returned to service following their calibration
4302-R29	R.B. Spray Pump Flow	Specific steps assure the flow transmitter is returned to service following calibration
4302-R27	RCS Outlet Temperature	Specific steps assure the RTD's are reconnected following the calibration
4302-R26	High Pressure Injection Flow	Specific steps assure the instruments are returned to service following calibration

PROCEDURE #	TITLE	METHOD USED TO ASSURE COMPONENT/SYSTEM IS RETURNED TO SERVICE
4302-R25	Low Pressure Injection Flow Channel Calibration	Specific steps assure the transmitters are back in service at the completion of the calibration
4302-R24	Core Flood Tank Level and Pressure Calibration	Specific steps assure the transmitters are returned to service at the completion of the calibration
4302-R21	Make-up Storage Tank Level	Specific steps assure the transmitters are returned to service at the completion of the calibration
4302-R20	Reactor Building Air Pressure	Specific steps assure the transmitters are returned to service at the completion of the calibration
4331-R3	Fire Barrier Penetration Fire Seal Inspection	This is visual inspection and involves no removal from service
4331-R4	Air Intake Tunnel Halon System Functional Test	To perform the test, portions of the electronic actuation circuitry is removed from service. Specific steps assure return to service at the completion of the testing
4331-SA1	Air Intake Tunnel Halon System Inspection	To perform the test portions of the electronic actuation circuitry is removed from service. Specific steps assure return to service at the completion of the testing
4331-SA2	Fire System Halon System Check	Specific steps are incorporated to assure the halon bottles are connected and charged
4333-M3	Fire Detection Circuits Operational Check	No equipment nor circuits are removed from service
4333-R2	Fire System Deluge/Sprinkler Functional Test	Specific steps assure the multistatic valves are properly reset and the system restored to service following test actuation

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4304-W2	SPC System Boron and Dissolved Gas Verification	This procedure does not involve removal of equipment from service
4304-W1	Borated Water Source Concentration Verification	This procedure does not involve removal of equipment from service
4303-SA2	R.B. Hatch Leak Rate Test	This test verifies the overall hatch leakrate and involves installing strongback clamps. Specific steps assure the removal of these clamps and the restoration of the hatch to normal service
4303-SA1	Seismic Instrumentation Functional Test	This test involves placing the instrumentation in a test mode and returning it to the operate mode per specific steps.
4303-R20	(Modified) H <sub>2</sub> Purge System Performance Analysis	No equipment is removed from service except a door to the filter housing is opened to establish airflow through the bank. A specific step assures the door is reclosed and filter integrity is maintained
4303-Q1	BOP Diesel Functional Test	This test verifies the auto start feature of the diesel and a specific step reestablishes the normal standby lineup at the conclusion of the test
4303-M36	4 KV ESF Bus Undervoltage Relays Functional Test	This test involves no removal of relays from service but merely utilizes an auto reset test pushbutton to verify the relay function
4303-M26 A/B	Boric Acid Pump Functional Test	This test does not involve removal of equipment from service
4303-M19	Long Term OTSG "B" Cooldown System Operability Test	This test involves no removal of equipment from service
4303-M18	Fuel Handling Bldg/Aux. Bldg Air Cleanup Remote Start and Operability Check	This test involves no removal of equipment from service.

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4301-M3	Seismic Instrument Checks	Seismic monitors are returned to service via specific procedure steps
4301-M4	Remote Shutdown Instrument Monthly Checks	No instruments are removed from service
4301-M13	BOP Diesel Generator Batteries Monthly Check	The batteries are not removed from service to perform this check
4301-Q1	Station Storage Batteries	The batteries are not removed from service to perform this check
4304-Q1	Diesel Fuel Testing	Diesels are not removed from service for this test. Further specific steps require verification of proper day tank level following completion of sampling.
4301-R2	BOP Diesel Generator Batteries Refueling Check	The batteries are not removed from service to perform the check
4301-R4	Chlorine Detection System Inspections & Maintenance	Procedure steps specifically restore the chlorine detectors to service as the procedure primary function. It also requires restart of the Control Building Ventilation system per its respective Operating Procedure
4301-R22	Station Batteries Refueling Check	Batteries are not removed from service to perform this check
4301-S1	Shift & Daily Checks	No equipment is removed from service to perform these checks

PROCEDURE #	TITLE	METHOD USED TO ASSURE COMPONENT/SYSTEM IS RETURNED TO SERVICE
4301-W1	Weekly Surveillance Checks	No equipment is removed from service to perform these checks
4301-W2	Station Storage Batteries and Chargers Weekly Check	No equipment is removed from service to perform this check
4301-W3	BOP Diesel Generators Batteries Weekly Checks	The batteries are not removed from service to perform these checks
4301-W5	13.2/4KV Alternate Electrical Feed to Bus 2-5 Operability Test	This test involves manually lining up the alternate 13.2/4 KV power source. Although the test involves no removal of equipment from service the normal standby status is reestablished at the test conclusion by specific procedure steps.
4301-W4	ON/OFF Site Power Supply Checks	These checks involve no removal of equipment from service
4302-M1	Gas Partitioner Channel Calibration	This calibration does not involve removal of equipment from service but rather a verification of desired analysis results using a known gas concentration standard
4302-R1.6	Intermediate Range Channel	This procedure places the intermediate range channel in a "test" mode. The channel is returned to the "Operate" mode via specific steps in a procedure 4303-M5 which is performed in conjunction with and at the conclusion of this procedure.
4302-R1.7	Source Range Neutron Flux and Rate	Specific steps return the source range modules to their "operate" mode following recalibration
4302-R4	Incore Thermocouple Indication Calibration	Specific step assures all thermocouples are reconnected.
4302-R8	Reactor Coolant System Flow - NNI	Specific steps assure channels are returned to service

PROCEDURE #	TITLE	METHOD USED TO ASSURE COMPONENT/SYSTEM IS RETURNED TO SERVICE
4302-R11	4 KV Bus 2-1E and 2-2E Undervoltage Relay Calibration	Specific steps and operability checks assures the relays are in service at the conclusion of the calibration
4302-R19	Borated Water Storage Tank Temperature and Level	Specific steps restore instruments to service following calibration
4331-R2	Fire Hose Station Inspection	Specific step, assure the hoses are inspected and stowed properly.
4331-R1	Fire System Deluge/Sprinkler System Inspection	This is a visual inspection of the deluge system and nozzles. No equipment is removed from service
4331-M1	Fire System Hose Station Visual Inspection	This visual inspection does not remove equipment from service
4311-10	Control Room Emergency Ventilation Charcoal Analysis	This surveillance is performed in conjunction with SP 4303-R25 below and is subject to the constraints therein
4303-R25	Control Room Emergency Ventilation Performance Analysis	This DOP & Freon test is performed with the system in service. Fans are temporarily secured for a charcoal sample if necessary but a checkoff in the procedure assures it is lined up for operation at the conclusion of testing.
4305-SA1	Dike Inspection	This inspection involves no removal of equipment from service
4311-5	Containment Integrity	This surveillance involves a leakrate test on the personnel access hatches in order to assure containment integrity
4304-W1	RCS-Boron and Dissolved Hydrogen Concentration Verification	This procedure does not involve removal of equipment from service



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4333-R5	Fire System Valve Functional Test	Specific steps assure the system valves which are stroke tested are returned to their service condition
4333-SA1	Fire System Detector Instrument Functional Test	Specific steps assure the system is restored to the operate mode following the functional test
4333-SA2	Fire Detection Circuits Operational Check	The check involves control of removal of fuses and their replacement and return to normal operation per specific steps
4333-3Y1	Fire System Deluge/Sprinkler System Flow Test	Specific steps assure the system is restored to service following the testing
4333-3Y2	Fire System Hose Station Functional Test	Specific steps assure the fire hoses are reconnected and rolled up following the hydrostatic test
4392-R18	4 KV Bus 2-3E and 2-4E Undervoltage Relay Calibration	Specific steps assure that the relays are returned to service following calibration
4602-R18	Diesel Fuel Day Tank Level	Specific steps assure the level instruments are back in service following calibration
4301-M15	Atmospheric Radiation Monitors Service Check for NMC Units	Specific steps assure the monitor is properly restored to service following the source checks
4601-M1	Reclaimed Boric Acid Tank Temperature Channel Check	No instruments are removed from service
4602-R4	Boric Acid Mix Tank Temperature and Level	Specific steps assure the instruments are restored to service following calibration
4602-R5	Reclaimed Boric Acid Tank Level and Temp. Calibration	Specific steps assure the instruments are restored to service following calibration



PROCEDURE #	TITLE	METHOD USED TO ASSURE COMPONENT/SYSTEM IS RETURNED TO SERVICE
4602-R10	Control Room Air Temperature	Specific steps assure the instrument is restored to service following calibration
4602-R14	Containment Air Temperature	Specific steps assure the RTD's are reconnected following calibration of the instrument loops.
4602-R17	Diesel Fuel Storage Tank Level	Specific steps assure the transmitters are restored to service following calibration
4603-R1	Diesel "DF-X-1A" (DF-X-1B) Generators Protective Relaying	Specific steps assure the relays are operable following the calibration
4692-R1	Sodium Hydroxide Storage Tank Level Calibration	Specific steps assure that the lifted leads are reconnected following the instrument loop calibration
4692-R9	Decay Heat Removal Temperature Calibration	Specific steps assure that the terminal link is closed to restore the loop to service
4692-R16	Condensate Storage Tank Level Calibration	Specific steps assure that the instruments are restored to service following calibration
4692-R20	RTD Input Functional Calibration (Computer)	Specific steps assure the RTD's are reconnected and computer outputs requested to assure they are properly connected
4311-9	Control Room Emergency Vent Performance Analysis	Performance of this test is per SP 4303-R25. Comment under 4303-R25 is applicable here
4311-15	Aux. Bldg. Air Cleanup System Performance Analysis	This DOP test does not remove the system from service
4311-13	FHB Air Cleanup System Performance/ Analysis	This DOP test does not remove the system from service

PROCEDURE #	TITLE	METHOD USED TO ASSURE COMPONENT/SYSTEM IS RETURNED TO SERVICE
4303-M17	Condensate Pump Functional Test	This test does not remove any pumps from service
4303-M30 A/B	NSCCW Pump Operability Test and Valve Operability Test	This test does not remove any pumps from service except when valves are test stroked then specific steps assure return to normal lineup
4303-M27 A/B	Motor Driven Emergency Feedpump Operability Test and Valve Operability Test	This test does not remove any pumps from service except when valves are test stroked, then specific steps assure return to normal lineup
4692-R15	Sodium Hydroxide Storage Tank Level Calibration	Specific steps assure the transmitter is restored to service following calibration
4302-R3	Radiation Monitoring System	Specific steps assure the transmitter is restored to service following calibration
4302-R30	RCS Pressure Channel Calibration	Specific steps assure that the instrument is returned to service following the calibration
4301-M10	NSCCW Valve Lineup Verification	The visual check involves no removal of equipment from service
4301-Q2	BOP D.G. Battery Check	No components are removed from service to perform this check