METROPOLITAN EDISON COMPANY
SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603 TELEPHONE 215 – 929-3601

December 29, 1978
GQL 2071

Mr. Eldon J. Brunner, Chief
Reactor Operations & Nuclear Support Branch
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Three Mile Island Nuclear Station, Unit 1
Operating License No. DPR-50
Docket No. 50-289
Inspection Report No. 78-19

This letter and the attachment are in response to your inspection letter of December 7, 1978, concerning Mr. Haverkamp's inspection of TMI-1 and the resultant finding of one apparent infraction.

Sincerely,

J. G. Herbein
Vice President-Generation

JGH:DGM:jdp

Attachment

Metropolitan Edison Company
Operating License No. DPR-50
Docket No. 50-289
Inspection Report No. 78-19

RESPONSE TO VIOLATION

General Response:

To ensure that all of the Operating Procedures have received sufficient review, the Operations Engineer has been tasked to audit the Control Room file of Operating Procedures and identify and correct any additional discrepancies of this nature. This audit is expected to be complete by March 1979.

Specific Response:

Infraction (i):

Changes were made to Operating Procedure (OP) 1103-2, "Filling and Venting Reactor Coolant (RC) System," completed April 18, April 26, and April 28, 1978. The changes, which did not alter the intent of the original procedure, were not approved, documented or reviewed.

Response:

Procedure Change Request (PCR) #78-909, to OP 1103-2 was submitted on 11/9/78. PCR #78-909 will ensure that these minor changes become a permanent change to the procedure. PCR #78-909 will become effective by January 15, 1979.

Infraction (ii):

OP 1104-2, "Makeup and Purification System," which provided requirements for each system startup and shutdown, had been used for multiple system startup and shutdown evolutions performed on April 25, April 28, June 22, and June 27, 1978. In addition, verification of individual step (by operator initialing) and system startup satisfactory completion (by licensed operator signature), as required by OP 1104-2, was not completed for the system startup on June 27, 1978.

Response:

Review of OP 1104-2 with respect to these discrepancies, identified a procedural inadequacy, in that the startup and shutdown sequence of evolutions could be confused to require a shutdown before a startup was complete. Procedure Change Request #78-933 to OP 1104-2 was submitted on 12/8/78 to clarify this sequence of operation. PCR #78-933 will help to ensure that this discrepancy does not occur in the future. PCR #78-933 will become effective by January 15, 1979.

Infraction (iii):

OP 1104-4, "Decay Heat Removal System," completed April 28, and June 22, 1978, did not indicate completion of steps in Enclosure (1), Startup Valve Checklist. In addition, the procedures required completion of an Enclosure (2), which did not exist.

Response:

A review of 1104-4, indicated an oversight in the Procedure revision process which did not remove the references to Enclosure (2). Procedure Change Request #78-949 to OP 1104-4, submitted on 12/8/78, will correct this oversight. PCR #78-949 will become effective by January 15, 1979.

Infraction (iv):

Satisfactory completion of the post-refueling approach to criticality on April 28, 1978, could not be demonstrated by a completed OP 1103-8, "Approach to Criticality."

Response:

Further review of this discrepancy reveals that initial cycle criticality is achieved in accordance with Physics Test Procedure 1550-02. All of the required critical data for the April 28, 1978 approach to criticality after refueling is documented in PTP 1550-02. OP 1103-8 is used for a return to criticality other than after a refueling. Therefore, no corrective action is deemed necessary.

Infraction (v):

Surveillance Procedure 1301-9.5,"Reactivity Anomaly," completed and reviewed October 31, 1978, was not properly implemented in that a data sheet contained an incorrect value for the power correction to reactivity. Another unlisted, but correct, value was used in the computation of reactivity anomaly. The erroneous data was not identified during subsequent procedure check and approval required by SP 1301-9.5.

Response:

Following the identification of this discrepancy concerning the incorrect value for the power correction to reactivity, a corrected data sheet was placed in the October 31, 1978, SP 1301-9.5.