

558

G/12-16-78

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 1 has has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

See attached memo L.L. Lawyer to R.M. Klingaman

Note extension request to 10/15/78

THIS DOCUMENT CONTAINS POOR QUALITY PAGES

Submitted:

L.L. Lawyer

L.L. Lawyer

8/25/78

Date

Basis for acceptance/rejection:

extension based on the attached "N" item N. 8227-1 assigning the policy statement formulation to R.M. Klingaman

Close out / Extension

Accepted

Rejected

Gerald A. Loignand

Lead Audit Engineer or his designee

8/25/78

Date

Concurred:

A. J. Hill

8/25/78

Audit Team Leader / Member

Date

cc: Submitting party

GP 4015.003

11/22/77

Rev. 3

Change 3

8001170 26.0

Note: it took them 8 months to issue a 105pg 1/4 page memorandum 4/28/78 to 11/28/78

MEMO from:

SANDY LAWYER

BAWPN  
RNP

August 16, 1978  
N-8227-1

R. M. Klingaman:

An audit on the Met-Ed Respiratory Program was made by the QA-QC Section. The audit finding (78-07-1) notes that we do not have a "policy statement" issued as required by NRC Reg. Guide 8.15 Section C1.

This audit also requires that the policy statement must be issued "from a high management level" (i.e. manager level) in order to conform to the Reg. Guide. Please have a memo prepared to G. P. Miller which defines the Met-Ed policy concerning the Respiratory Protection Program which meets the requirements of Reg. Guide 8.15 Section C1.

*L.L. Lawyer*  
L.L. Lawyer

ATTN

Attachments - Audit Finding  
Reg. Guide 8.15  
G.P. Miller - memo dated 2/24/78

cc: GPM (w/o attach)  
BFH (w/o attach)  
PGC (w/o attach) - F. H. Grice should help  
GJT - Request change of date on audit finding.

Target Date: October 15, 1978

*In my opinion  
ykt. 5/23*

~~LLL~~ LLL: Is a manager considered "high management level" or does it require the signature of VP Gen?  
*LL*

Subject: Overdue Audit Finding

To: L. L. Sawyer,

Please be informed that the Target Date of 11/30/78, by which you were to have completed

Audit 78-07; Finding 1

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Serald A. Loignon, Jr. 12/11/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GPF 4015.006  
11/22/78  
Rev. 3  
Change 3

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 1 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken Status: The personnel turnover in the RS&EE group has imposed a heavy load on the remaining individuals. The Resp. Policy Statement has just been reassigned to another individual and is expected to be finished by 11/30/78. It is requested that the audit due date be extended to 11/30/78. Submitted

W.S. Wilkinson 10/24/78  
Date

Basis for acceptance/rejection:

This project has been reassigned from F.A. Jenkins, who has left Met Ed, to A. J. Good.

Close out/Extension  
Accepted  
Rejected

P.G.L. [Signature] 10/24/78  
10/24/78 Lead Audit Engineer or his designee Date

Concurred:

[Signature] 10/25/78  
Audit Team Leader Date

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 1 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

I talked with W.S. Wilkerson about this finding. He will track it down and send a status report/extension request - probably after he returns from the Fuel Performance Meeting on 10/19/78. No overdue notice will be sent until after that time if it becomes necessary.

Audible Longman 10/10/78  
Date

Basis for acceptance/rejection:

Close out/Extension  
Accepted  
Rejected

\_\_\_\_\_  
Lead Audit Engineer Date  
or his designee

Concurred:

\_\_\_\_\_  
Audit Team Leader Date

AUDIT FINDING CLOSEOUT/EXTENSION/STATUS REPORT FORM

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 1 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

*See attached Respiratory Protection Policy Statement issued 12/26/78*

Submitted:

*LOL for*

*L. L. Lowyer*

1/3/79

Date

Basis for acceptance/rejection:

*the attached policy statement satisfies the disposition and is in accordance with Reg. Guide 8.15. The specifics of the respiratory protection program are contained in the implementing procedures*

Close out/Extension  
 Accepted  
Rejected

*Gerald A. Longino Jr.*  
Lead Audit Engineer  
or his designee

1/3/79  
Date

Concurred:

*R. F. K...gall...*  
Audit Team Leader

1/3/79  
Date

# METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject	MANAGEMENT POLICY REGARDING RESPIRATORY PROTECTION PROGRAM	Location	Reading
To	G. P. MILLER	Date	December 26, 1978 GEM 6019

*N-8227-1 Audit Summary  
12-27-1  
Slide 9.5 Sec. C1*

The primary objective of the respiratory protection program shall be to provide maximum protection for employees by limiting the inhalation of airborne radioactive materials. The respiratory protection program shall be in compliance with:

1. 10CFR20; Standards for Protection Against Radiation
2. NRC Regulatory Guide 8.15; Acceptable Programs for Respiratory Protection (October 1976)
3. Nureg 0041; Manual of Respiratory Protection Against Airborne Radioactive Materials (October 1976)

The objective of the respiratory protection program shall be normally accomplished by the application of engineering controls, including process, containment, and ventilation equipment. In the event engineering controls are not adequate or cannot be applied, the use of respiratory protection devices may be appropriate. However, the use of respiratory protective devices is less desirable than engineering controls.

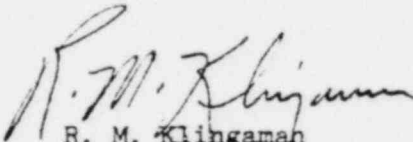
The following considerations for respiratory protective device use are taken into account regarding circumstances under which respiratory protection may be needed. For routine operations, respiratory protection may be accomplished through the use of practicable engineering controls. The use of respirators in routine operations is inappropriate except when engineering controls are being instituted, evaluated, are non-functional, or not feasible. For nonroutine operations, engineering controls may be impractical. In this case the use of respirators to avoid excessive exposure to airborne radioactive materials is appropriate. Preparations must be made for coping with potential emergencies which may involve respiratory hazards.

Persons responsible for establishing and maintaining respiratory protection programs must institute engineering controls where feasible and avoid unwarranted use of respirators.

The respiratory protection program must include such considerations as periods of respiratory use and relief from respiratory use. Specific time limits are unrealistic, however, due to variable factors such as job requirements, physical capacities, and psychological attitudes of individuals. Provisions must be made for respirator users to leave areas where respirator use is required, for relief when such relief is needed.

It is understood that requisite samples and analysis will be accomplished prior to any respirator use to ensure the correct respirator is used.

Compliance with the respiratory protection program shall be mandatory. Pursuit of the safest working environment attainable is everyone's responsibility.

  
R. M. Klingaman  
Ext. 6515

RMK:BAG:clb

G. J. Troffer  
cc: M. R. Buring  
R. W. Dubiel  
B. A. Good  
L. L. Lawyer

File: 63.0012.0000



MEMO from:  
SANDY LAWYER

December 18, 1978  
N-8350-1

B. F. HERNADY:

SUBJECT: Audit 7807-01

The attached documents that Audit 7807 Finding 1 is overdue. Please do the following:

1. Contact G. A. Loignon, find out what the finding was and what action was agreed to.
2. Did I sign this Audit Finding?
3. Do the staff work required in preparation for closing out the Audit, if you can. If you are not able to, see me and give me a discussion of what the problem is and what the course of action you recommend.

L.L.Lawyer

:mm  
Attachment

cc: G. A. Loignon (w/o attach)

Target Date: 12/30/78

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDING 78-07-1


Location Reading

To L. L. LAWYER

Date July 31, 1978  
GQM 3379

Corrective action on the subject audit finding was scheduled to be completed by 6/15/78. You were notified of the present overdue condition on 6/29/78 and 7/10/78. The apparent failure to close this finding indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

1. any corrective action which has been taken, or will be taken;
2. the corrective action which will be taken to avoid future delays of this type; and
3. the date this finding will be closed.

  
G. J. TROFFER  
Manager-Generation  
Quality Assurance  
Ext. 111

  
GJT:GAL:iem

cc: J. G. Herbein

File: 02.0002.0018.0004

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

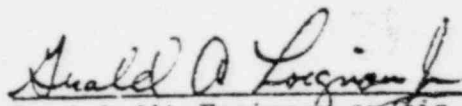
Location Reading

Date 7/10/78

To L L Lawyer

Please be informed that Finding # 1 of Audit 78-07 has passed its disposition date. You were notified of this condition on 6/29/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 7/17/78.

The attached form may be utilized for reply.

  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head, Unit Superintendent J.G. Herbein (w/o attach)  
Lead Audit Engineer (w/o attach)

Attached: GPF 4015.003

GPF 4015.007

u/m/m

100

Subject: Overdue Audit Finding

by L.L. Lawyer

Please be informed that the Target Date of 6/15/78, by which you were to have completed

Audit 78-07; Finding # 1

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

P. A. Levine 6/29/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

4015.006  
4/12/11  
3  
3

*Note: This was finally corrected by a 1 1/4 page memorandum issued 12/26/78, 6 months later!*

AUDIT FINDING CLOSEOUT/EXTENSION/STATUS REPORT FORM

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 2 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status: HPP 1717 has been revised to delete the "Time" requirement on the chart paper. This became effective on 10/10/78

Submitted:

J. Mulleavy 11/30/78  
Date

Basis for acceptance/rejection:

Verified that HPP 1717 has been revised to delete the requirement for marking "time" on the respiratory test chart paper which satisfies the disposition.

Close out/Extension  
 Accepted  
 Rejected

Gerald R. Roegner 12/1/78  
Lead Audit Engineer or his designee Date

Concurred:

T.F. Barbeyall 12/1/78  
Audit Team Leader Date

cc: Submitting party  
GPF 4015.003  
11/22/77  
Rev. 3  
Change 3

*Smarts*

METROPOLITAN EDISON COMPANY      Subsidiary of General Electric Utilities Corporation

Subject      OVERDUE AUDIT FINDINGS  
78-07-2, 4, 5, and 7

Location      Reading

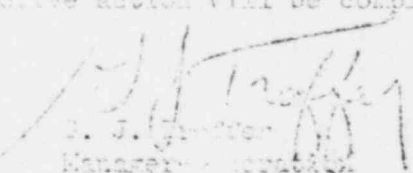
Date      November 27, 1978  
CGM 5454


To      R. W. JENSEL

The subject audit findings were originally scheduled to be closed by 6/1/78 (78-07-2, 4, and 7) or 7/1/78 (78-07-5). The due dates were extended to 10/23/78. You were notified of the present overdue condition on 10/31/78 and again on 11/14/78 and requested to provide QA Audit with the status of the corrective action.

Please respond in writing within ten (10) days. Your response should include the following:

1. Any corrective action which has been taken or will be taken;
2. the corrective action which will be taken to avoid future delays of this type; and
3. the date that the corrective action will be completed.

  
J. J. Trotter  
Manager, Operations  
Quality Assurance  
EXT. 111

  
cc: J. G. Herstein  
E. L. Laxer  
F. A. Levine  
G. P. Miller  
J. P. O'Keefe  
B. G. Trabbacher

FILE: 02.3702.0018.0004

METROPOLITAN Edison COMPANY Subsidiary General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

To: R.W. Dubiel

Date 11/14/78

Please be informed that Findings 2,4,5 & 7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 10/31/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 11/21/78.

The attached form may be utilized for reply.

*Gerald R. Loignon Jr.*  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Hara, G.P.U. Inc. (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007  
11/22/77  
Rev. A  
Change 3

Subject: Overdue Audit Finding

To: R.W. Dubiel,

Please be informed that the Target Date of 10/23/78, by which you were to have completed

Audit 78-07; Findings 2,4,5,7

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Serald A. Loignon 10/31/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GFF 4015.006  
11/22/77  
Rev. 3  
Change 3



SEP 05 78 P.A.L.

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 2 has has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

Section 5.2.2.7 & 5.2.2.10 of 1717 has been revised deleting the "Time of day" requirement.

Submitted:

T. Murray

Date

Basis for acceptance/rejection:

The above referenced change to HPP 1717 has been submitted to PERC but has not yet been approved. Therefore, this finding cannot be closed. However, the due date will be extended to 11/20/78 to allow time for the approval and distribution of the change.

Close out/Extension  
Accepted  
Rejected

Donald C. [Signature]  
Lead Audit Engineer  
or his designee

9/12/78  
Date

Concurred:

A. Tubbs  
Audit Team ~~Leader~~  
member

9/12/78  
Date

cc: Submitting party  
GPT 4015.003  
11/22/77  
Rev. 3  
Change 3

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS 78-07-2,3,4,6, AND 7

Location Reading

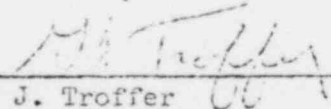
To R. W. DUBIEL

Date August 22, 1978  
GQM 3845

The subject audit findings were originally scheduled for closeout on 6/1/78. T. L. Mulleavy was notified that the due date had passed on 6/13/78. A due date extension to 7/15/78 was requested by you on 6/26/78 and accepted by QA Audit on 6/29/78. You were notified of the present overdue condition on 7/24/78 and 8/8/78.

The apparent failure to close these findings indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

1. Any corrective action which has been taken, or will be taken;
2. The corrective action which will be taken to avoid future delays of this type; and
3. The date these findings will be closed.

  
G. J. Troffer  
Manager-Generation  
Quality Assurance  
EXT. 111

  
GAL:GJT:bw

cc: J. G. Herbein  
L. L. Lawyer  
G. P. Miller

File: 02.0002.0018.0004

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 8/8/78

To R.W. Dubiel

Please be informed that Findings 2, 3, 4, 6 and 7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 7/24/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 8/21/78.

The attached form may be utilized for reply.

Donald A. Loeggen  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Hanlon (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007

11/22/77

Rev. 3

Change 3

INTER-OFFICE MEMORANDUM

Subject: Overdue Audit Finding

: R. W. Dubiel,

Please be informed that the Target Date of 7/15/78, by which you were to have completed

Audit 78-07; Finding 2, 3, 4, 6, & 7

has passed. Please complete this form and return it to the Supervisor-QA Mr. G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Donald A. Loignon Jr. 7/24/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

4015.006  
4/2/78  
3  
3

AUDIT FINDING CLOSEOUT/EXTENSION

To: Audit Coordinator

Audit 78-07 Finding D/3/4/6/7 has been resolved to my satisfaction by  
the action described in Letter \_\_\_\_\_

Memo \_\_\_\_\_

Report \_\_\_\_\_

This Form X

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken: All PCR's Submitted - however none are through typing + distribution at this time.

Request extension to 7/15/78

Submitted:

R.W. Deibel 6/26/78  
Date

cc: Submitting party

This is not an unreasonable length of time for the administrative work to be completed in

Accepted  
Rejected

Anala P. Rogiano 6/29/78  
Audit Coordinator Date  
head Audit Engineer or his Designee

J.T. Borkowski 6/29/78  
Team Leader/Member Concurrence

Subject: Overdue Audit Finding

T.L. Mullen

Please be informed that the Target Date of 6/1/78, by which you were to have completed

Audit 78-07; Finding # 2

A. Levine

has passed. Please complete this form and return it to the Supervisor-QA ~~to G. A. Loignon, Jr.~~ If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

P. G. [Signature]  
Lead Audit Engineer  
~~or his designee~~

6/13/78  
Date

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

4015.006  
[Handwritten marks]

SEP 05 '78 P.A.L.

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 3 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

H.P.P. 1616 has been revised to reflect the required cleaning solution temperatures. The revisions went into effect 07-10-78

Submitted:

[Signature] 8/26/78  
Date

Basis for acceptance/rejection:

Verified that ¶ 5.7.3 and 5.7.4 specify cleaning water temperature in accordance with Reg Guide 8.15 in rev. 10 of HPP 1616 (7/10/78)

Close out/Extension  
Accepted  
Rejected

[Signature] 9/5/78  
Lead Audit Engineer or his designee Date

Concurred:

[Signature] 9/12/78  
Audit Team Leader Date  
Member

cc: Submitting party  
GPP 4015.003  
11/22/77  
Ref. 3  
Change 3

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS 78-07-2,3,4,6, AND 7

Location Reading

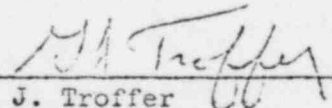
To R. W. DUBIEL


Date August 22, 1978  
GQM 3845

The subject audit findings were originally scheduled for closeout on 6/1/78. T. L. Mulleavy was notified that the due date had passed on 6/13/78. A due date extension to 7/15/78 was requested by you on 6/26/78 and accepted by QA Audit on 6/29/78. You were notified of the present overdue condition on 7/24/78 and 8/8/78.

The apparent failure to close these findings indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

1. Any corrective action which has been taken, or will be taken;
2. The corrective action which will be taken to avoid future delays of this type; and
3. The date these findings will be closed.

  
G. J. Troffer  
Manager-Generation  
Quality Assurance  
EXT. 111

  
-GAL:CJT:bw

cc: J. G. Herbein  
L. L. Lawyer  
G. P. Miller

File: 02.0002.0018.0004



# METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

To R.W. Dubiel

Date 8/8/78

Please be informed that Findings 2, 3, 4, 5 and 7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 7/24/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 8/21/78.

The attached form may be utilized for reply.

Gerald A. Loignon, Jr.  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Healen (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007

11/22/77

Rev. 3

Change 3

INTER-OFFICE MEMORANDUM

Subject: Overdue Audit Finding

By: R. W. Dubiel,

Please be informed that the Target Date of 7/15/78, by which you were to have completed

Audit 78-07; Finding 2, 3, 4, 6, & 7

has passed. Please complete this form and return it to the Supervisor-QA G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Gerald A. Loignon Jr. 7/24/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

1015.006

7/11

3

3

AUDIT FINDING CLOSEOUT/EXTENSION

To: Audit Coordinator

Audit 78-07 Findings 234/6/7 has been resolved to my satisfaction by

the action described in

Letter	_____
Memo	_____
Report	_____
This Form	<u>X</u>

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken: All PCR's Submitted - however none are through typing + distribution at this time.  
 Request extension to 7/15/78

Submitted:

R.W. Dubril 6/26/78  
 Date

cc: Submitting party

This is not an unreasonable length of time for the administrative work to be completed in

Accepted  
 Rejected

Donald P. Rogian 6/29/78  
 Audit Coordinator Date  
 head Audit Engineer or his Designee

J. J. Baker 6/29/78  
 For [unclear]

Subject: Overdue Aud. Finding

by: T.L. Mullen

Please be informed that the Target Date of 6/1/78, by which you were to have completed

Audit 78-07; Finding # 3

P.A. Levine

has passed. Please complete this form and return it to the Supervisor-QA or ~~C. A. Loignon, Jr.~~ If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

P. A. Levine 6/13/78  
Lead Audit Engineer Date  
~~or his designee~~

ITEM NOT COMPLETED

Status

Requesting New Target Date  
\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

4015.006  
6/2/78  
3

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 4 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

A new step has been added to H.P.P. 1616 to cover this finding. It became effective on 10/16/78

Submitted:

J. Murray 11/30/78  
Date

Basis for acceptance/rejection:

Verified that step 5.11.4 of HPP 1616 Rev. II requires the inspection and test of new respiratory equipment prior to its use. This satisfies the disposition

Close out/Extension  
Accepted  
Rejected

Gerald A. Loignon 12/1/78  
Lead Audit Engineer or his designee Date

Concurred:

T.F. Barbogallo 12/1/78  
Audit Team Leader Date

METROPOLITAN EDISON COMPANY

S subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS  
78-07-2, 4, 5, and 7

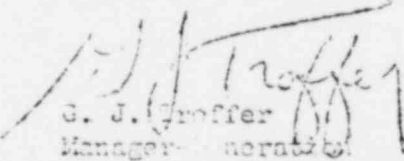
To R. W. SOBIELE

Location Reading  
Date November 27, 1978  
GQM 5454

The subject audit findings were originally scheduled to be closed by 6/1/78 (78-07-2, 4, and 7) or 7/1/78 (78-07-5). The due dates were extended to 10/23/78. You were notified of the present overdue condition on 10/31/78 and again on 11/14/78 and requested to provide QA Audit with the status of the corrective action.

Please respond in writing within ten (10) days. Your response should include the following:

1. Any corrective action which has been taken or will be taken;
2. the corrective action which will be taken to avoid future delays of this type; and
3. the date that the corrective action will be completed.

  
G. J. Troffer  
Manager - Operations  
Quality Assurance  
ENT. 111

  
GJT:GAB:sw

cc: J. G. Herbein  
L. E. Lawyer  
F. A. Levine  
G. P. Miller  
J. P. O'Hanlon  
B. H. Brabham

File: 66-5002, QAS, 0004

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 11/14/78

To: R.W. Dubiel

Please be informed that Findings 24587 of Audit 78-07 has passed its disposition date. You were notified of this condition on 10/31/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 11/21/78.

The attached form may be utilized for reply.

*Gerald R. Loignon Jr.*  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Hanlon, G.P.U. Inc. (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007  
11/22/77  
Rev. 3  
Change 3

Subject: Overdue Audit Finding

To: R.W. Dubiel,

Please be informed that the Target Date of 10/23/78, by which you were to have completed

Audit 78-07; Findings 2(4)5,7

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Arnold A. Loignon 10/31/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer



To: Lead Audit Engineer or his designee

Audit 78-07 Finding 4 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

HPP 1616 has been revised to include inspection and testing of new equipment prior to use.

Submitted:

Murray 8/26/78  
Date

Basis for acceptance/rejection:

The above referenced revision to HPP 1616 has been submitted to PDR but has not yet been approved. Therefore, this finding cannot be closed. However, the due date will be extended to 10/20/78 to allow time for the approval and distribution of the change.

Close out/Extension:  
 Accepted  
 Rejected

Donald [Signature] 9/12/78  
Lead Audit Engineer or his designee Date

Concurred:

[Signature]  
Audit Team Leader Date

Member

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS 78-07-2, 3, 4, 6, AND 7

Location Reading

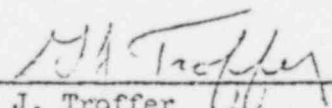
To R. W. DUBIEL


Date August 22, 1978  
GQM 3845

The subject audit findings were originally scheduled for closeout on 6/1/78. T. L. Mulleavy was notified that the due date had passed on 6/13/78. A due date extension to 7/15/78 was requested by you on 6/26/78 and accepted by QA Audit on 6/29/78. You were notified of the present overdue condition on 7/24/78 and 8/3/78.

The apparent failure to close these findings indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

1. Any corrective action which has been taken, or will be taken;
2. The corrective action which will be taken to avoid future delays of this type; and
3. The date these findings will be closed.

  
G. J. Troffer  
Manager-Generation  
Quality Assurance  
EXT. 111

  
-GAL:GJT:bw

cc: J. G. Herbein  
L. L. Lawyer  
G. P. Miller

File: 02.0002.0018.0004

# METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 8/8/78

To R.W. Dubiel

Please be informed that Findings 2, 3, 4, 5 and 7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 7/24/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 8/21/78.

The attached form may be utilized for reply.

Donald A. Loggion Jr.  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Healon (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007

11/22/77

Rev. 3

Change 3

INTER-OFFICE MEMORANDUM

Subject: Overdue Audit Finding

R. W. Dubiel,

Please be informed that the Target Date of 7/15/78, by which you were to have completed

Audit 78-07; Finding 2, 3, 4, 6, 9, 7

has passed. Please complete this form and return it to the Supervisor-QA G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Gerald A. Loignon Jr. 7/24/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

8015.006

7/27/78

3

3

AUDIT FINDING CLOSEOUT/EXTENSION

To: Audit Coordinator

Audit 78-07 Findings 2/30/6/7 has been resolved to my satisfaction by the action described in

Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_  
This Form X

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken: All PCR's Submitted - however none are through typing + distribution at this time.  
Request extension to 7/15/78

Submitted:

R.M. Dubiel 6/26/78  
Date

cc: Submitting party

This is not an unreasonable length of time for the administrative work to be completed in

Accepted  
Rejected

Anala R. Ferguson 6/29/78  
Date  
head Audit Engineer or his Designee

J.F. Baker 6/29/78  
Team Leader/Member Checkmark

Subject: Overdue Audit Finding

To: T. L. Mullenbary,

Please be informed that the Target Date of 6/1/78, by which you were to have completed

Audit 78 07; Finding # 4

A. Levine

has passed. Please complete this form and return it to the Supervisor-QA c/o ~~G. A. Leignon, Jr.~~ If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

A. J. Levine 6/13/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

\_\_\_\_\_  
\_\_\_\_\_

Requesting New Target Date of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

811 4225.006

6/13/78

100

100

Subject: Overdue Audit Finding/Recommendation

TO: R W Durbid

Please be informed that the Target Date of 7/1/79, by which you were to have completed

Audit 78-07; Finding/Recommendation 5

has passed. Please complete this form and return it to the Supervisor-QA c/o P. A. Levine or G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence, please enter your comments instead.

Gualdo Loignon  
Lead Audit Engineer  
or his designee

7/12/79  
Date

ITEM NOT COMPLETED

Status

-----  
-----

Requesting New Target Date of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

CPF 4015.000  
2/16/79  
Rev. 4

Subject: Overseas Audit Finding/Recommendation

By: R. W. Dubiel

Please be informed that the Target Date of 3/1/79, by which you were to have completed

Audit 78-07; Finding/Recommendation 5 and 6

has passed. Please complete this form and return it to the Supervisor-QA c/o P. A. Levine or G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence, please enter your comments instead.

P. A. Levine  
Lead Audit Engineer  
~~or his designer~~

3/16/79  
Date

ITEM NOT COMPLETED

Status

PERC approved PCR's  
not Typed & Distributed

Requesting New Target Date of 5/1/79

R. W. Dubiel  
3/19/79

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

*Accepted new target date of 5/1/79*

*P. Levine*  
*701*  
*3/26*

cc: Lead Audit Engineer



Subject: Overseas Audit Finding/Recommendation

By: R. W. Duhal

Please be informed that the Target Date of 3/1/79, by which you were to have completed

Audit 78-07; Finding/Recommendation 5 and 6

has passed. Please complete this form and return it to the Supervisor-QA c/o P. A. Levine or G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence, please enter your comments instead.

P. A. Levine  
Lead Audit Engineer  
~~or his designee~~

3/16/79  
Date

ITEM NOT COMPLETED

Status

\_\_\_\_\_  
\_\_\_\_\_

Requesting New Target Date of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GPF 4013.006  
2/16/79  
Rev. 4

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS

FEB 0 7 1979 PAL

Location TMI Nuclear Station  
Middletown, PA 17057  
Date February 5, 1979

To G. J. TROFFER

Ref: GQM 0285

A response to Audit Finding 77-29-11 was submitted on 1/26/79. That finding will continue to be unresolved until the concerns in that response are satisfactorily resolved.

On ~~2/5/79~~ Tom Mulleavy submitted a request for extension on Audit Findings 78-07-05 and 78-07-06. The procedure changes to close out those findings has been PORC approved but the change is not yet typed and distributed.



R. W. DUBIEL  
Supervisor  
Radiation Protection & Chemistry

RWD:dws

- cc: J. G. Herbein  
L. L. Lawyer  
P. A. Levine  
D. F. Limroth  
J. B. Logan  
G. P. Miller  
R. N. Prabhakar  
J. L. Seelinger

AUDIT FINDING CLOSEOUT/EXTENSION/STATUS REPORT FORM

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 05-96 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

*needs looking into*

*HPP1616 was changed to reflect an actual log book for equipment maintenance tracking. The change has been approved by Unit I&II PORC's and the procedure is in typing. Due to the work load and higher priority tasks due to the Unit I outage the procedure has not been typed and put out on distribution as yet. Request completion date be 3/1/79*

Submitted:

*Fleming L. Mulleray*

2/5/79  
Date

Basis for acceptance/rejection:

*The above referenced PCR changes HPP1616's reference to a log book kept by the Radiation Protection and Chemistry Dept. to reflect an actual form on which respiratory equipment maintenance will be recorded. It also contains the changes required to table 1 which was previously footnoted without explanation.*

Close out  Extension  
 Accepted  
 Rejected

*Arnold A. Loignon, Jr.*  
Lead Audit Engineer,  
or his designee

2/9/79  
Date

*2/12/79*  
*[Signature]*

Concurred:

*T. B. Loyall*  
Audit Team Leader

2/4/79  
Date

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS

Location Reading

To R. W. DUBIEL

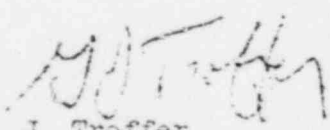
Date January 26, 1979  
GQM 0285

Ref: GQM 5334 (11/20/78) and GQM 6228 (12/22/78)

Audit finding 77-29-11 was originally due on April 30, 1978. After three overdue notices were sent to you and it became more than five weeks overdue, it was extended to August 15, 1978. Three more overdue notices were sent to you when the extended due date was not met. When you did not respond to any of the three notices, each requesting you to provide QA Audit with the status of the corrective action, a meeting was arranged between the Manager - Generation Quality Assurance, Manager - Generation Operations, Supervisor - QA, Station/Unit Superintendents, and yourself for December 22, 1978 to discuss the resolution of this finding and preventing recurrence of this long overdue condition. The meeting was cancelled based on a discussion between the Manager - Generation Quality Assurance and the Station Superintendent - Administration who committed to ensuring that the corrective action was completed.

Also note that findings 78-07-05 and 78-07-06 are more than five weeks overdue. You have been notified of these overdue findings by two previous memorandums.

Please provide QA Audit with the status of the corrective action for each of these findings and a schedule for completion. Your response should be written and is requested within ten calendar days.

  
G. J. Troffer  
Manager - Generation  
Quality Assurance

  
GJT:GAL:clb

cc: J. G. Herbein  
L. L. Lawyer  
P. A. Levine  
D. Limroth  
J. B. Logan  
G. P. Miller  
R. K. Prabhakar  
J. L. Seelinger

File: 02.0002.0018.0005

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 5 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

A section has been added to H.P.P. 1616 which will help document maintenance performed on resp. equipment - This became effective on 10/16/78

Submitted:

[Signature] 11/30/78  
Date

Basis for acceptance/rejection:

The Respiratory Equipment Maintenance Log referenced in HPP 1616 was not started when QA Audit tried to verify implementation of the corrective action on 12/18/78.

Please provide QA Audit with the status of the corrective action and a closeout date.

Close out  
 Extension  
 Accepted  
 Rejected

[Signature] 12/19/78  
Lead Audit Engineer or his designee Date

Concurred:

[Signature] 12/17/78  
Audit Team Leader Date

## METROPOLITAN EDISON COMPANY

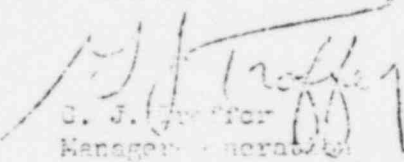
Subsidiary of General Public Utilities Corporation

Subject	OVERDUE QA AUDIT FINDINGS 78-07-2, 4, <u>5</u> , and 7	Location	Reading
To	R. W. ABIEL	Date	November 27, 1978 GQM 5454

The subject audit findings were originally scheduled to be closed by 6/1/78 (78-07-2, 4, and 7) or 7/1/78 (78-07-5). The due dates were extended to 10/23/78. You were notified of the present overdue condition on 10/31/78 and again on 11/14/78 and requested to provide QA Audit with the status of the corrective action.

Please respond in writing within ten (10) days. Your response should include the following:

1. Any corrective action which has been taken or will be taken;
2. the corrective action which will be taken to avoid future delays of this type; and
3. the date that the corrective action will be completed.

  
G. J. Trotter  
Manager - Corporate  
Quality Assurance  
EXT. 111

  
GJ:TAL:bw

cc: J. G. Herbein  
L. L. Lawyer  
F. A. Levine  
G. P. Miller  
J. P. O'Hendon  
B. D. Prunhofer

File: 62.002.0018.0004

Subject      OUTSTANDING AUDIT FINDING

Location      Reading

Date      11/14/78

To      R.W. Dubiel

Please be informed that Findings 2,457 of Audit 78-07 has passed its disposition date. You were notified of this condition on 10/31/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 11/21/78.

The attached form may be utilized for reply.

Arnold R. Loignon, Jr.  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Hara, G.P.U. Inc. (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007  
11/22/77  
Rev. 3  
Change 3

Subject: Overdue Audit Finding

To: R.W. Dubiel,

Please be informed that the Target Date of 10/23/78, by which you were to have completed

Audit 78-07; Findings 2,4,5,7

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Serald A. Loignon 10/31/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer



SEP 05 '78 P.A.L.

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 5 has has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

A Log Book will be maintained to document the maintenance performed by the H.P. Dept. on respiratory Equipment. HPP 1616 changed to include this.

Submitted:

H.P.D 1717 will be used for personnel response to Resp Protection.

[Signature] 9/24/78  
Date

Basis for acceptance/rejection:

The above referenced changes to HPP 1616 and HPP 1717 have been submitted to PERC but have not yet been approved. Therefore, this finding cannot be closed. However, the due date will be extended to 11/29/78 to allow time for the approval and distribution of the changes.

Close out/Extension  
 Accepted  
 Rejected

[Signature] 9/24/78  
Lead Audit Engineer or his designee Date

Concurred:

[Signature] 9/12/78  
Audit Team Leader Date  
Name Not

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDING 78-07-5

Location Reading

To R. W. DUBIEL

Date August 14, 1978  
GQM 3647

The subject finding was scheduled for closeout on 7/1/78. T. L. Mulleavy was notified of this overdue condition on 7/10/78. You were notified on 7/24/78. The apparent failure to close this finding indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

- 1) any corrective action which has been taken, or will be taken;
- 2) the corrective action which will be taken to avoid future delays of this type; and
- 3) the date this finding will be closed.

GJT:GAL:iem

G. J. TROFFER  
Manager-Generation  
Quality Assurance

cc: J. G. Herbein  
L. L. Lawyer  
G. P. Miller

File: 02.0002.0018.0004

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 7/24/78

To R.W. Dubiel

Please be informed that Finding 5 of Audit 78-07 has passed its disposition date. You were notified of this condition on 7/10/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 8/7/78.

The attached form may be utilized for reply.

Gerald A. Loignon Jr  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent G.P. Miller (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007

11/22/77

P.v. 3

Change 3

Subject: Overdue Audit Finding

: J.L. Mulleavy,

Please be informed that the Target Date of 7/1/78, by which you were to have completed

Audit 78-07; Finding 5

is passed. Please complete this form and return it to the Supervisor-QA  
C. A. Loignon, Jr. If this item has not been completed, please apply for a  
New Target Date by entering requested date in the appropriate space below. If  
the item has been completed, please indicate (by number, if possible) any  
correspondence that references this fact. If there is no pertinent corres-  
pondence, please enter your comments instead.

Arnold A. Loignon, Jr. 7/10/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Item Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

1015.006  
7/7/78  
3

Subject: Overdue Audit Finding/Recommendation

TO: R.W. Dubiel

Please be informed that the Target Date of 7/1/79, by which you were to have completed

Audit 78-07; Finding/Recommendation 6

has passed. Please complete this form and return it to the Supervisor-QA c/o P. A. Levine or ~~G. A. Leigson, Jr.~~ If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence, please enter your comments instead.

Gerald A. Leigson Jr.  
Lead Audit Engineer  
or his designee

7/12/79  
Date

ITEM NOT COMPLETED

Status

\_\_\_\_\_  
\_\_\_\_\_

Requesting New Target Date of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

Project Number and Finding/Recommendation

R N Dubiel

Please be informed that the Target Date of 3/1/79, by which you were to have completed

Audit \_\_\_\_\_; Finding/Recommendation Jan 6

has passed. Please complete this form and return it to the Supervisor-QA c/o P. A. Levine or G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence, please enter your comments instead.

P.A. Levine  
Lead Audit Engineer  
~~or his designee~~

3/16/79  
Date

ITEM NOT COMPLETED

Status

PARC approved PAR'S  
Not Typed & Distributed:

R N Dubiel  
3/17/79

Requesting New Target Date of 5/1/79

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

*Accepting new target date of 5/1/79*  
*[Signature]*  
*3/23*

cc: Lead Audit Engineer

Subject: Overseas Audit Finding/Recommendation

By R. K. Duhal

Please be informed that the Target Date of 3/1/79, by which you were to have completed

Audit 78-07; Finding/Recommendation 5 and 6

has passed. Please complete this form and return it to the Supervisor-QA c/o P. A. Levine or G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence, please enter your comments instead.

P. A. Levine  
Lead Audit Engineer  
~~or his designee~~

3/16/79  
Date

ITEM NOT COMPLETED

Status

\_\_\_\_\_  
\_\_\_\_\_

Requesting New Target Date of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS

FEB 07 1979 PAL

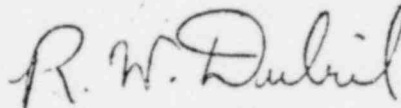
Location TMI Nuclear Station  
Middletown, PA 17057  
Date February 5, 1979

To G. J. TROFFER

Ref: GQM 0285

A response to Audit Finding 77-29-11 was submitted on 1/26/79. That finding will continue to be unresolved until the concerns in that response are satisfactorily resolved.

On 2/5/79 Tom Mulleavy submitted a request for extension on Audit Findings 78-07-05 and 78-07-06. The procedure changes to close out those findings has been PORC approved but the change is not yet typed and distributed.



R. W. DUBIEL  
Supervisor  
Radiation Protection & Chemistry

RWD:dws

cc: J. G. Herbein  
L. L. Lawyer  
P. A. Levine  
D. F. Limroth  
J. B. Logan  
G. P. Miller  
R. N. Prabhakar  
J. L. Seelinger



To: Lead Audit Engineer or his designee

Audit 78-07 Finding 05-96 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

HPP1616 was changed to reflect an actual log book for equipment maintenance tracking. The change has been approved by Unit I & II PORC's and the procedure is in typing. Due to the work load and higher priority tasks due to the Unit I outage the procedure has not been typed and put out on distribution as yet. Request completion date be 3/1/79 Submitted: Thomas L. Mulleray 2/5/79 Date

Basis for acceptance/rejection:

The above referenced PCR changes HPP1616's reference to a log book kept by the Radiation Protection and Chemistry Dept. to reflect an actual form on which respiratory equipment maintenance will be recorded. It also contains the changes required to table 1 which was previously footnoted without explanation.

Close out  Extension  Accepted  Rejected

PAK  
2/12/79  
JLW  
2/12

Serald A. Loignon 2/9/79  
Lead Audit Engineer or his designee Date

Concurred:

JF Barboglio 2/9/79  
Audit Team Leader Date

METROPOLITAN EDISON COMPANY      Subsidiary of General Public Utilities Corporation

Subject: OVERDUE AUDIT FINDINGS

Location: Reading

To: R. W. DUBIEL

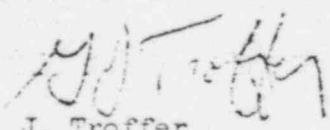
Date: January 26, 1979  
GQM 0285


Ref: GQM 5334 (11/20/78) and GQM 6228 (12/22/78)

Audit finding 77-29-11 was originally due on April 30, 1978. After three overdue notices were sent to you and it became more than five weeks overdue, it was extended to August 15, 1978. Three more overdue notices were sent to you when the extended due date was not met. When you did not respond to any of the three notices, each requesting you to provide QA Audit with the status of the corrective action, a meeting was arranged between the Manager - Generation Quality Assurance, Manager - Generation Operations, Supervisor - QA, Station/Unit Superintendents, and yourself for December 22, 1978 to discuss the resolution of this finding and preventing recurrence of this long overdue condition. The meeting was cancelled based on a discussion between the Manager - Generation Quality Assurance and the Station Superintendent - Administration who committed to ensuring that the corrective action was completed.

Also note that findings 78-07-05 and 78-07-06 are more than five weeks overdue. You have been notified of these overdue findings by two previous memorandums.

Please provide QA Audit with the status of the corrective action for each of these findings and a schedule for completion. Your response should be written and is requested within ten calendar days.

  
G. J. Troffer  
Manager - Generation  
Quality Assurance

  
GJT:GAL:clb

cc: J. G. Herbein  
L. L. Lawyer  
P. A. Levine  
D. Lizaroth  
J. B. Logan  
G. P. Miller  
R. K. Prabhakar  
J. L. Seelinger

File: 02.0002.0018.0005

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 6 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

HPP 1616 has been revised to meet the current Protection Factors for Respiratory Equip. Effective <sup>P.C.R.</sup> Date 7/10/78

Submitted:

Thomas L. Muehlberg 12/11/78  
Date

Basis for acceptance/rejection:

While the procedure (HPP 1616 Table 1) has been revised to reflect NURSG 0041 for protection factors, Table 1 has been footnoted without explanation. This was pointed out when the closeout was first rejected (9/12/78) and the due date was extended to 11/23/78 to allow time for the explanations to be added to the Table.

- Close out/Extension
- Accepted
- Rejected

Donald A. Longino 12/14/78  
Lead Audit Engineer or his designee Date

Concurred:

Please provide QA Audit with the status of the corrective action and a proposed closeout date

J. S. B. [Signature] 12/14/78  
Audit Team Leader Date

Subject: Overdue Audit Finding

To: R.W. Dabiel,

Please be informed that the Target Date of 11/23/78, by which you were to have completed

Audit 78-07; Finding 6

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Gerald A. Loignon Jr      12/4/78  
Lead Audit Engineer      Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GPF 4015.006  
11/22/77  
Rev. 3  
Change 3

Subject: Overdue Audit Finding

To: R.W. Dubiel,

Please be informed that the Target Date of 11/23/78, by which you were to have completed

Audit 78-07; Finding 6

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Donald A. Loignon Jr 11/27/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GPF 4015.006  
11/22/77  
Rev. 3  
Change 3

SEP 05 '78 **PAL**

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 6  has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

Procedure HP 1616 has been revised to be consistent with NUREG 0041 in the area of protection factors. The revision went into effect 07/10/78

Submitted:

[Signature]

Date

Basis for acceptance/rejection:

While the change referenced above has been approved and distributed, and table 1 of APP 1616 does seem to be consistent with NUREG 0041, table 1 is footnoted without applicable application. Therefore, this finding cannot be closed. However, the Close out/Extension Accepted Rejected date will be extended to 11/22/78 in order to allow time to get a new change approved and distributed.

[Signature]  
Lead Audit Engineer  
or his designee

9/12/78  
Date

Concurred:

[Signature]  
Audit Team Leader

9/12/78  
Date

Member

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS 78-07-2,3,4,6, AND 7

Location Reading

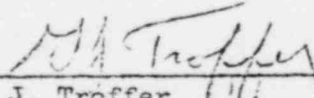
To R. W. DUBIEL

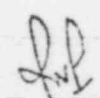
Date August 22, 1978  
GQM 3845

The subject audit findings were originally scheduled for closeout on 6/1/78. T. L. Mulleavy was notified that the due date had passed on 6/13/78. A due date extension to 7/15/78 was requested by you on 6/26/78 and accepted by QA Audit on 6/29/78. You were notified of the present overdue condition on 7/24/78 and 8/8/78.

The apparent failure to close these findings indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

1. Any corrective action which has been taken, or will be taken;
2. The corrective action which will be taken to avoid future delays of this type; and
3. The date these findings will be closed.

  
G. J. Troffer  
Manager-Generation  
Quality Assurance  
EXT. 111

  
-GAL:GJT:bw-

cc: J. G. Herbein  
L. L. Lawyer  
G. P. Miller

File: 02.0002.0018.0004

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 8/8/78

To R.W. Dubiel

Please be informed that Findings 2, 3, 4, 6, and 7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 7/24/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 8/21/78.

The attached form may be utilized for reply.

Donald A. Loewen  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Hanlon (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007

11/22/77

Rev. 3

Change 3

INTER-OFFICE MEMORANDUM



Subject: Overdue Audit Finding

by R. W. Dubiel

Please be informed that the Target Date of 7/15/78, by which you were to have completed

Audit 78-07; Finding 2, 3, 4, 6, 7

has passed. Please complete this form and return it to the Supervisor-QA, Mr. G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Gerald A. Loignon Jr. 7/24/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

Reference; My Comments:

Lead Audit Engineer

4015.006  
7/2/78  
3  
3

AUDIT FINDING CLOSEOUT/EXTENSION

To: Audit Coordinator

Audit 78-07 Findings 2/3/70/7 has been resolved to my satisfaction by

the action described in Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_  
This Form X

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken: All FCR's Submitted - however none are through typing + distribution at this time.  
Request extension to 7/15/78

Submitted:

R.W. Deibel 6/26/78  
Date

cc: Submitting party

This is not an unreasonable length of time for the administrative work to be completed in

Accepted  
Rejected

Arnell R. Ferguson 6/29/78  
Audit Coordinator Date  
head Audit Engineer or his designee

FF 4015.003  
12/76  
2

J.F. Baker 6/29/78  
Team leader/Member Concurrence

1WK UD NOTICED  
for PCR

Subject: Overdue Audit Finding

To: T.L. Hulleavy

Please be informed that the Target Date of 6/1/79, by which you were to have completed

Audit 78-07; Finding # 6

*P.A. Levine* has passed. Please complete this form and return it to the Supervisor-QA c/o ~~G. W. Laignon, Jr.~~ If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

P. J. Levine 6/13/78  
Lead Audit Engineer Date  
~~or his designee~~

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

62-4025-016

11/1/78

Ink Notice for  
TCN

Subject: Overdue Audit Finding

To: JL. McWherry,

Please be informed that the Target Date of 4/5/78, by  
which you were to have completed

Audit 78-07; Finding # 6

has passed. Please complete this form and return it to the Supervisor-QA  
~~of C. A. Loignon, Jr.~~ If this item has not been completed, please apply for a  
new Target Date by entering requested date in the appropriate space below. If  
the item has been completed, please indicate (by number, if possible) any  
correspondence that references this fact. If there is no pertinent corres-  
pondence, please enter your comments instead.

A. Levine

P. A. Levine  
Lead Audit Engineer  
or his designee

5/4/78  
Date

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GRF 4015.006  
11/22/11  
Rev. 3  
Change 3

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 7 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

A new section has been added to H.P.P. 1616 under Inspection of all Respiratory Equipment. It became effective 10/16/78 and covers this finding

Submitted:

J. Mackey 11/30/78  
Date

Basis for acceptance/rejection:

Verified that section 5.11 of HPP 1616 Rev. 11 requires at least monthly inspections for routinely used and personnel issue respiratory equipment. This satisfies the disposition.

Close out/Extension  
 Accepted  
 Rejected

Donald A. Loignon 12/1/78  
Lead Audit Engineer or his designee Date

Concurred:

T.F. Beitzell 12/1/78  
Audit Team Leader Date

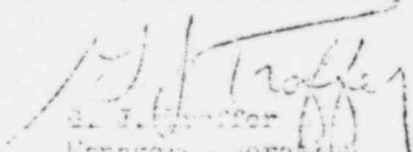
METROPOLITAN EDISON COMPANY      Subsidiary of General Public Utilities Corporation

Subject	OVERDUE AUDIT FINDINGS 78-07-2, 4, 5, and 7	Location	Reading
To	R. W. REBIEL	Date	November 27, 1978 GQM 5454

The subject audit findings were originally scheduled to be closed by 6/1/78 (78-07-2, 4, and 7) or 7/1/78 (78-07-5). The due dates were extended to 10/23/78. You were notified of the present overdue condition on 10/31/78 and again on 11/14/78 and requested to provide QA Audit with the status of the corrective action.

Please respond in writing within ten (10) days. Your response should include the following:

1. Any corrective action which has been taken or will be taken;
2. the corrective action which will be taken to avoid future delays of this type; and
3. tag date that the corrective action will be completed.

  
E. I. Trotter  
Manager, Generation  
Quality Assurance  
EXT. 111

  
GJM:GAL:tr

cc: J. G. Herboin  
L. L. Layser  
F. A. Levine  
G. P. Miller  
J. P. O'Malley  
H. N. Prabhakar

File: 02.000.0078.004

METROPOLITAN Edison COMPANY Subsidiary General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 11/14/78

To: R.W. Dubiel

Please be informed that Findings 2,4,5,7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 10/31/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 11/21/78.

The attached form may be utilized for reply.

Gerald A. Loignon Jr.  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: Dept. Head/Unit Superintendent J.P. O'Hanlon, G.P. Miller (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007  
11/22/77  
Rev. 1  
Change 3

Subject: Overdue Audit Finding

To: R.W. Dubiel,

Please be informed that the Target Date of 10/23/78, by which you were to have completed

Audit 78-07; Findings 2,4,5,6

has passed. Please complete this form and return it to the Supervisor-QA c/o G. A. Loignon, Jr. If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

Serald A. Loignon 10/31/78  
Lead Audit Engineer Date  
or his designee

ITEM NOT COMPLETED

Status

Requesting New Target Date  
of \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer



SEP 05 '78 P.A.U.

To: Lead Audit Engineer or his designee

Audit 78-07 Finding 7 has/has not been resolved to my satisfaction.

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken/Status:

A change to H.P.P. 1616 para 5.11 has been submitted to include inspection of routinely used/personal issued respiratory devices

Submitted:

Mullany 8/26/78  
Date

Basis for acceptance/rejection:

The above referenced change has been submitted to PERC but has not yet been approved. Therefore, this finding cannot be closed. The due date will be extended to 10/22/78 to allow time for approval and distribution.

Close out/Extension  
 Accepted  
 Rejected

Paul 9/2/78  
Lead Audit Engineer or his designee Date

Concurred:

A. M. Miller 9/12/78  
Audit Team Leader Date

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OVERDUE AUDIT FINDINGS 78-07-2,3,4,6, AND 7

Location Reading

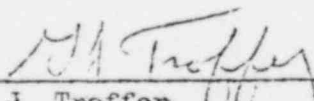
To R. W. DUBIEL

Date August 22, 1978  
GQM 3845

The subject audit findings were originally scheduled for closeout on 6/1/78. T. L. Mulleavy was notified that the due date had passed on 6/13/78. A due date extension to 7/15/78 was requested by you on 6/26/78 and accepted by QA Audit on 6/29/78. You were notified of the present overdue condition on 7/24/78 and 8/8/78.

The apparent failure to close these findings indicates a weakness in the management control system and requires a written reply within ten days. This reply should include:

1. Any corrective action which has been taken, or will be taken;
2. The corrective action which will be taken to avoid future delays of this type; and
3. The date these findings will be closed.

  
G. J. Troffer  
Manager-Generation  
Quality Assurance  
EXT. 111

  
-GAL:GJT:bw

cc: J. G. Herbein  
L. L. Lawyer  
G. P. Miller

File: 02.0002.0018.0004

METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject OUTSTANDING AUDIT FINDING

Location Reading

Date 8/8/78

To R.W. Dubiel

Please be informed that Findings 2, 3, 4, 5 and 7 of Audit 78-07 has passed its disposition date. You were notified of this condition on 7/24/78 and no action has apparently been taken to date. Please ensure that the corrective action is completed by 8/21/78.

The attached form may be utilized for reply.

Frank A. Luccione  
Lead Audit Engineer or his designee

Attachment (w/original only)

cc: J.P. O'Hanlon Head/Unit Superintendent (w/o attach)  
Lead Audit Engineer (w/o attach)

GPF 4015.007

11/22/77

Rev. 3

Change 3

INTER-OFFICE MEMORANDUM



AUDIT FINDING CLOSEOUT/EXTENSION

To: Audit Coordinator

Audit 78-07 Findings 2/3/4/6/7 has been resolved to my satisfaction by

the action described in Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_  
This Form X

If requesting a new completion date, please indicate the reason for the delay and the requested date in the Action Taken section of this form.

Action Taken: All PCR's Submitted - however none are through typing + distribution at this time.  
Request extension to 7/15/78

Submitted:

R.M. Dubiel 6/26/78  
Date

cc: Submitting party

This is not an unreasonable length of time for the administrative work to be completed in

Accepted  
Rejected

Anne R. Fournier 6/29/78  
Audit Coordinator Date  
head Audit Engineer or his designee

J. B. English 6/29/78  
T. J. ...

Subject: Overdue Audit finding

To: T.L. Mullaney,

Please be informed that the Target Date of 6/1/78, by which you were to have completed

Audit 18-07; Finding # 7

has passed. Please complete this form and return it to the Supervisor-QA c/o ~~G. A. Loignon, Jr.~~ If this item has not been completed, please apply for a new Target Date by entering requested date in the appropriate space below. If the item has been completed, please indicate (by number, if possible) any correspondence that references this fact. If there is no pertinent correspondence, please enter your comments instead.

? A.  
evine

G. A. Loignon 6/3/78  
Lead Audit Engineer Date  
~~or his designee~~

ITEM NOT COMPLETED

Status

Requesting New Target Date of \_\_\_\_\_

ITEM COMPLETED

Date Completed: \_\_\_\_\_

Reference: Letter \_\_\_\_\_  
Memo \_\_\_\_\_  
Report \_\_\_\_\_

No Reference; My Comments:

cc: Lead Audit Engineer

GA 4015.006  
11/27/11  
10/2/3  
10/2/3

METROPOLITAN EDISON COMPANY      Subsidiary of General Public Utilities Corporation

Subject    AUDIT 78-07, RESPIRATORY PROGRAM (NUCLEAR)

Location    Reading

Date    April 28, 1978  
         GQM 1701

To        R. W. DUBIEL  
          L. L. LAWYER  
          G. P. MILLER

I.    Persons Conducting Audit

1.    T. F. Barbagallo - Team Leader
2.    A. T. Tribble    - Team Member

II.   Personnel Contacted

1.    R. W. Dubiel        - Supervisor, Radiation Protection & Chemistry
2.    E. F. Gee            - Safety Supervisor
3.    L. J. Landry        - Health Physics Engineer
4.    T. L. Mulleavy     - Radiation Protection Supervisor
5.    J. D. Wealand      - Administrator - Safety - Nuclear

III.   Applicable Reference Documents

1.    10CFR 20.103, Exposure of Individuals to Concentrations of Radioactive Materials in Air In Restricted Areas.
2.    Regulatory Guide 8.15, Acceptable Program For Respiratory Protection
3.    NUREG-0041 (Final), Manual of Respiratory Protection Against Airborne Radioactive Materials.
4.    Health Physics Procedure 1616, Revision 8, Use of Respiratory Protective Devices.
5.    Health Physics Procedure 1717, Revision 0, Operation of Respiratory Test Booth.
6.    Memo dated 11/16/77, J. G. Herbein to F. H. Grice, Subject - Respiratory Program.
7.    Memo, GAM-4587, 11/21/77, Subject - Respiratory Protection at TMI
8.    Memo, 2/24/78, G. P. Miller to TMI Staff, Subject - Respiratory Protection Program

IV.   Summary

An audit was conducted on 3/16/78 for the purpose of assessing the adequacy of, and compliance with the applicable procedures/standards relative to the Respiratory Protection Program for TMI, Units 1 and 2.

The audit revealed deficiencies relating primarily to lack of the Respiratory Program/Procedures meeting the full intent of the referenced standards. Seven (7) findings were issued to document these deficiencies. The findings are attached to this report, discussed in the Detailed Summary section, and can be summarized as follows:

- a. Lack of the Respiratory Program meeting the requirements of Reg. Guide 8.15 relative to policy statement, inspection and testing for new equipment, maintenance records for respirators, and monthly inspection for non-emergency equipment.
- b. The respirator protection factors contained in HPP-1616 are different than the values specified in Reg. Guide 8.15.
- c. Solution temperatures for cleaning respirators as specified in HPP-1616 do not comply with the temperature requirements of Reg. Guide 8.15.

#### V. Detailed Summary

This section summarizes the areas of compliance and noncompliance that were observed during the course of the audit. Noncompliances including dispositions, are detailed on the Audit Finding Report Forms which are attached to this report. The findings as discussed below are a summarized version of the detailed Audit Finding Report Forms.

##### 1. Policy Statement - Respirator Usage

A Met-Ed memo, dated 2/24/78, Subject - Respiratory Protection Program, issued by the Unit 2 Superintendent/Station Superintendent was presented to the audit team as a policy statement. This memo does not address the policy statement requirements established by Reg. Guide 8.15 and NUREG-0041. As a result of this noncompliance, the following finding was issued:

##### Finding 78-07-1

A policy statement has not been issued that addresses the requirements of Reg. Guide 8.15 and NUREG-0041.

##### 2. Training

Audit observations provided evidence that individuals who wear respiratory protective devices have been instructed via a training course, as required by HPP-1616. A record of these individuals which includes the date of training, and type of instruction is maintained by the Training Department.

HPP-1717 provides for the performance of fitting tests by use of a test booth with a controlled atmosphere. In this test, work conditions are simulated, such as normal breathing, deep breathing, frown, and running in place. A minor procedural noncompliance was noted and addressed by the following finding:



Finding 78-07-2

The time of the day that the test is administered is not noted on the chart paper that is used for recording the test, as required by HPP-1717.

3. Medical Examinations

This item was audited with satisfactory results. It was verified that individuals are evaluated by a physician to ensure that they are physically and mentally able to perform the work and use respiratory protective equipment. The medical records provided evidence that the examining physician investigates the appropriate physiological and psychological factors specified in NUREG-0041. In addition, the physician provides a statement as to whether or not he considers the employee able to wear respiratory equipment.

4. Respirator Protection Factors

The protection factors for particulates, gas and vapors listed in HPP-1616, Table 1616-1, were reviewed against the protection factors specified in Reg. Guide 8.15, Table 1. A lack of agreement between protection factor values was noted and a finding was issued:

Finding 78-07-6

The protection factors in HPP-1616 are inconsistent with the values specified in Reg. Guide 8.15.

5. Respirator Maintenance

a. Emergency Equipment

It was noted that emergency respiratory devices are sealed in kits at various designated plant locations. A record of the kits, locations, and inspection results is provided on Form 1616-1, "Inspection of Emergency Respiratory Equipment", and the inspection of each kit is performed on a monthly basis as required. In addition, inspection record tags are utilized and attached to each kit.

b. Non-emergency Equipment

The respiratory program provides for the inspection of non-emergency respiratory equipment before and after use. However, one area of noncompliance to the inspection requirements of Reg. Guide 8.15 and NUREG-0041 was noted and reported by the following finding:

Finding 78-07-7

HPP-1616 does not provide for monthly inspection of routinely used/personal issued respiratory devices.

c. Cleaning of Equipment

A finding was issued regarding lack of meeting the cleaning requirements of Reg. Guide 8.15 and NUREG-0041, due to HPP-1616 specifying incorrect solution temperatures for the cleaning of respirators, i.e.:

Finding 78-07-3

The required cleaning solution temperatures are 120°F to 140°F, however, HPP 1616 specifies a maximum temperature of 180°F. In addition, no minimum temperature is specified in HPP 1616.

d. New Equipment

The following finding was issued regarding the lack of inspection and testing of new respiratory equipment:

Finding 78-07-4

The respiratory program does not provide for the inspection and testing of new equipment as required by Reg. Guide 8.15 and NUREG-0041.

6. Records

Records pertaining to air sampling and bioassay programs were reviewed with satisfactory results. These programs provide for records of accurate and continuous monitoring of spaces whenever work is performed as well as records of the internal exposures of individual workers.

Training and fitting records are maintained, and the record identifies what types of masks each person can wear.

One area of noncompliance was noted and addressed by a finding, in that the respiratory program does not provide for meeting the maintenance record requirements imposed by Reg. Guide 8.15 and NUREG-0041:

Finding 78-07-5

Maintenance records are not kept to provide knowledge of service time for respirators, common failure modes of particular respirator types, and personnel complaints on respirator design.

VI. Persons at Post Audit Review

1. T. F. Barbagallo - Team Leader - 3/29 and 31/78
2. R. W. Dubiel - Supervisor, Radiation Protection & Chemistry - 3/29/78
3. T. L. Mulleavy - Radiation Protection Supervisor - 3/29/78
4. B. F. Hernady - Supervisor, Nuclear Fuels Group - 3/31/78
5. P. A. Levine - Lead Audit Engineer - 3/31/78
6. R. N. Prabhakar - Supervisor, QA - 3/31/78

Submitted: T. F. Barbagallo  
T. F. Barbagallo  
Team Leader

Submitted: A. T. Tribble  
A. T. Tribble  
Team Member

Approved: G. J. Troffer  
G. J. Troffer  
Manager - Generation Quality Assurance

GJT:ATT:TJB:bar

cc: GORB - D. H. Reppert  
W. W. Cotter  
E. F. Gee  
J. G. Herbein  
B. F. Hernady  
L. J. Landry  
P. A. Levine  
L. Mulleavy  
J. P. O'Hanlon  
R. N. Prabhakar  
J. D. Wealand

File: 02.0002.0018.0004

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 1 of 7

Date: 3/16/78 Facility: TMI - 1 & 2

Subject: RESPIRATORY PROGRAM (NUCLEAR)

Finding:

Reg. Guide 8.15, section C1 states in part, "A written policy statement on respirator usage is to be issued from a high management level... Subjects to be covered by the policy statement include the use of practicable engineering controls instead of respirators; routine, non-routine, and emergency situations; and periods of respirator use and relief from respirator use. (NUREG-0041, section 2, 3.2, 12.1)".

A Met-Ed memo, dated 2/24/78, subject-Respiratory Protection Program, issued by Unit 2 Superintendent/Station Superintendent was presented to the audit team as the policy statement. However, this memo was not issued by a high management level, nor does it cover the policy statement subjects, as required by Reg. Guide 8.15.

Note: Memo, 11/16/77, J. G. Herbain to F. H. Grice indicates that Met Ed is committed to meeting Reg Guide 8.15

Disposition:

Issue a policy statement that meets the requirements of Reg. Guide 8.15, Section C1.

Due date: June 15, 1978

Audit Team Leader: Thomas Babzelle 3/29/78

Responsible Person (Circle One: Agreement/Disagreement, as to reported finding and disposition: NA)

Notified Supervisor (Circle One: Agreement/Disagreement, as to reported finding and disposition: [Signature])

Disagreement with finding (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

Finding Closed:

*Seward O. Loignon Jr.*  
Lead Audit Coordinator or Designee  
Engineer

1/4/79  
Date

CPF 4016.003  
4/30/77  
Rev 3

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 2 of 7

Date: 3/16/78 Facility: TMI - 1 & 2

Subject: Respiratory Program (Nuclear)

Finding:

HPP-1717, Rev. 0, Operation of Respiratory Test Booth, Section 5.2.2.14 states, "Mark chart paper with the following information: 100% Range, Upstream, Date and Time." However, the time of the test is not being noted on chart paper.

Disposition:

Comply with the procedural requirement to note the time of the test on chart paper, or revise the procedure to delete this requirement.

Due date: June 1, 1978

Audit Team Leader: T. F. Barbeyello 3/29/78

Responsible Person (Circle One: Agreement/Disagreement) as to reported finding and disposition: Thomas A. McCleary 3/29/78

Notified Supervisor (Circle One: Agreement/Disagreement) as to reported finding and disposition: A. W. [unclear] 3/29/78

Disagreement with finding (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

Finding Closed:

Donald O. Lozier  
Lead Audit Coordinator or Designee  
Engineer

12/6/78  
Date

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 3 of 7

Date: 3/16/78 ; Facility: TMI - 1 & 2

Subject: RESPIRATORY PROGRAM (Nuclear)

Finding:

Reg. Guide 8.15, section C4d imposes NUREG-0041, Section 9.7, which specifies the cleaning of air purifying respirators with solution temperatures of 120°F - 140°F. Contrary to this requirement, HFP 1616, Rev. 6, specifies a maximum temperature of 135°F with no minimum temperature noted.

Disposition:

Revise HFP 1616 to comply with the above noted Reg. Guide requirement.

Due date: June 1, 1978

Audit Team Leader: J. F. Esposito 3/29/78

Responsible Person (Circle One: Agreement/Disagreement, as to reported finding and disposition: Thomas W. ... 3/29/78)

Notified Supervisor (Circle One: Agreement/Disagreement, as to reported finding and disposition: J. W. ... 3/29/78)



Disagreement with finding (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

---

Finding Closed:

Gerald A. Lorigion  
Lead Audit ~~Coordinator~~ or Designee  
Engineer

9/13/78  
Date

GPF 4016.003

4/6/77

Rev 3

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 4 of 7

Date: 3/16/78 Facility: TMI - 1 & 2

Subject: Respiratory Program (Nuclear)

Finding:

Reg. Guide 8.15, section C4d, imposes NUREG-0041, section 10.1, which requires an inspection/testing program for new respiratory equipment. However, the respiratory program presently in effect does not provide for same.

Disposition:

Provide respiratory program coverage for the inspection/testing of new respiratory equipment.

Due date: June 1, 1978

Audit Team Leader: J.F. Barbeylls 3/29/78

Responsible Person (Circle One: Agreement/Disagreement, as to reported finding and disposition: L.R. Wulbrun 3/29/78)

Notified Supervisor (Circle One: Agreement/Disagreement, as to reported finding and disposition: R.W. Duley 3/29/78)

Disagreement with finding (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

Finding Closed:

Donald A. Lawson  
Lead Audit Coordinator or Designee  
Engineer

12/6/78  
Date

GPF 4016.003  
4/30/77  
Rev 3

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 5 of 7

Date: 3/16/78 Facility: TMI - 1 & 2

Subject: RESPIRATORY PROGRAM (Nuclear)

Finding:

Reg. Guide 8.15, section C4g imposes NUREG-0041, Section 12.4.3 which requires that maintenance records are kept to provide knowledge of the out-of-service time for respirators, common failure modes of particular respirator types, and personnel complaints on respirator design. However, the present Respiratory Program does not include provision for meeting this requirement.

Disposition:

Include the above noted requirement for maintenance records in the Respiratory Program.

Due date: July 1, 1978

Audit Team Leader: J. F. Bubegiller 3/27/78

Responsible Person (Circle One: Agreement/Disagreement, as to reported finding and disposition: James J. Whelan)

Notified Supervisor (Circle One: Agreement/Disagreement, as to reported finding and disposition: J. W. Doherty 3/29/78)

Disagreement with finding (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

Finding Closed:

---

Audit Coordinator or Designee

---

Date

GPB 1016.003

7/2/77

Rev 3

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 6 of 7

Date: 3/16/78 Facility: TMI - 1 & 2

Subject: RESPIRATORY PROGRAM (Nuclear)

Finding:

Reg. Guide 8.15, Table 1, "Protection Factors for Respirators" includes requirements for protection factors related to particulates, gases, and vapors. However, the protection factors in HPP 1616, Rev. 6, Table 1616-1 are not in all cases consistent with the values contained in Reg. Guide 8.15, e.g. airline respirator, face piece, Mode D; self contained breathing apparatus, SCBA face piece full, Modes D and R, respectively.

Disposition:

Revise Table 1616-1 to conform to the requirements of Table 1 of Reg. Guide 8.15.

TCN by 4/5/78  
Due date: PCR by 6/1/78\*

Audit Team Leader: T. F. Barbagallo 3/29/78

Responsible Person (Circle One: Agreement/Disagreement, as to reported finding and disposition: Thurston H. Mulleavy 3/29/78)

Notified Supervisor (Circle One: Agreement/Disagreement, as to reported finding and disposition: R. R. Dubiel 3/29/78)

\* Effective date of approved revision per 3/30/78 telecon between T. Mulleavy, R. Dubiel and T. Barbagallo

TFB

Disagreement with finding (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

Finding Closed:

---

Audit Coordinator or Designee

---

Date

GPF 4016.003

4/30/77

Rev 3

Metropolitan Edison Company  
Audit Finding Report Form

Audit No. 78-07

Finding 7 of 7

Date: 3/16/78 Facility: TMI - 1 & 2

Subject: RESPIRATORY PROGRAM (Nuclear)

Finding:

Reg. Guide 8.15 section C4d imposes NUREG-0041, section 9.2a which includes a requirement that routinely used and personal-issue respiratory devices (non-emergency) are inspected at least monthly. However, HPP 1616, Rev. 6, section 5.11 does not provide for monthly inspection of same.

Disposition:

Provide measures to meet the intent of the above noted monthly inspection requirement.

Due Date: June 1, 1978

Audit Team Leader: T. F. Barbogallu 3/29/78

Responsible Person (Circle One: Agreement/Disagreement, as to reported finding and disposition: Thomas J. McElroy 3/29/78

Notified Supervisor (Circle One: Agreement/Disagreement, as to reported finding and disposition: D. N. Dubiel 3/29/78



Disagreement with findings (if any):

---

Alternate Disposition (if signed in disagreement):

---

Disposition as decided upon by Notified Supervisor and Manager-Generation Quality Assurance (in cases of disagreement):

---

Manager - Generation Quality Assurance

Finding Closed:

Herald O. Loignon Jr.  
Lead Audit Coordinator or Designee  
Engineer

12/6/78  
Date

GPF 4016.1003

4/1/77

Rev 3

Checklist for Audit 78-07

RESPIRATORY PROGRAM (NUCLEAR)

2/10/78

Len Landry H P Engr

Regulatory Guide 8.15 (10/76) Acceptable Programs for Respiratory Protection

Sat Unsat Remarks

1. Evidence that a written policy statement on respirator usage has been issued from a high management level, which includes use of practical engineering controls instead of respirators; routine, nonroutine, and emergency situations; etc. (Section C1)

— ✓ Finding 1

2. Is there a program established for air sampling and other surveys sufficient to identify the hazard, to evaluate individual exposures, and to permit proper selection of respiratory protective equipment? (Section C4a)

✓ — Radiation monitoring system (installed system - air monitors are gas, particulate and iodine)

3. Written procedures to ensure the adequate individual fitting of respirators, as well as such procedures to ensure the testing of respiratory protective equipment for operability immediately prior to each use: (Section C4c)

a. Are Quantitative Man-Tests performed by use of fitting chambers, i.e. test room test booth, or plastic hood (NUREG 0041, Section 8.5.1)

Finding 2 — HIPP 1717

b. Are work conditions simulated during fitting tests, e. g. normal breathing, deep breathing, frown, running in place, etc. (NUREG 0041, Section 8.5.1.2)

— —

4. Written procedures for maintenance to ensure full effectiveness of respiratory protective equipment, including procedures for cleaning and disinfection, decontamination, inspection, repair, and storage: (Section C4d)

except that time of day is not noted in charts HIPP 1717

a. Are routinely used and personal-issue devices inspected before and after each use and at least monthly (HP 1616, Section 5.11.1 provides for

— ✓ Finding 7

Sat

Unsat

Remarks

monthly inspection of emergency respirators only) (NUREG 0041, Section 9.2a)

c. NUREG 0041, Section 9.7 specifies cleaning of air-purifying respirators with solution temperatures of 120°F-140°F (HP 1616 Rev. 6, Section 5.7.3 specifies a max. temperature of 185°F and no minimum temperature is noted)

— ✓ Finding 3

d. Is there a QA Program in effect to cover the inspection/testing of new equipment? *Not in HPP 1616* (NUREG 0041, Section 10.1) ~~no~~.

— ✓ Finding 4

*Inspections are performed (Not documented) per Radiation Protection Supervisor*

5. Does the Respiratory Program provide for bioassays and other surveys, as appropriate, to evaluate individual exposures and to assess protection actually provided? (Section C4f)

✓ — *HPP 1628 Rev 3 Program for medical & Bioassay Exam Computer Printout with date of a reg'l analysis*

6. Records sufficient to permit periodic evaluation of the adequacy of the respiratory protection program: (Section C4g)

a. Is there evidence of periodic review of respirator usage, including identification of the hazard, specification, and use of the respirators, and analysis of the results of bioassay and air-sampling programs? These latter programs should include records of accurate and continuous monitoring of spaces whenever work is performed as well as records of the internal exposures of individual workers. (NUREG 0041, Section 12.4.1)

✓ — *review of computer printouts as done in month (not a full program)*

b. Is there evidence of a periodic review of respirator usage to provide for reordering canisters and other replacement parts and to establish a replacement table for respirator components? (NUREG 0041, Section 12.4.2)

✓ —

c. Are maintenance records kept to provide knowledge of the out-of-service time for respirators, common failure modes of particular respirator types, and personnel complaints on respirator design? (NUREG 0041, Section 12.4.3)

— ✓ Finding 5

d. Are training and fitting records kept for all workers who might use respiratory equipment and does the record include what makes of masks each person can wear?  
(NUREG 0041, Section 12.4.4)

Dr. Gerald Black MD  
6660 Joy Rd. Syracuse, N.Y.  
Environmental Health  
Screening Services  
Div. Environmental  
Hearing & Vision Consp'n

7. Determination prior to assignment of any individual to tasks requiring the use of respirators that such an individual is physically able to perform the work and use the respiratory protective equipment. A physician is to determine what health and physical conditions are pertinent. The medical status of each respirator user is to be reviewed at least annually: (Section C4h)

as determined per 7.4.3 NUREG  
{ EKG chest, x ray, Pulmonary, Vis acuity, history and limited physical  
a statement is given by the MD stating whether or not the employee is capable of wearing a respirator per  
Employee Number comments

a. Evidence of physical examinations for each user before he wears any device and at least annually thereafter?  
(NUREG 0041, Section 7.4.3)

✓

b. Is there evidence that the examining physician investigates the physiological factors and psychological factors as specified in NUREG 0041, Sections 7.4.1 and 7.4.2, respectively?

✓

check No Employee Dept  
from existing physiological  
and psychological factors

Physical examination

AA

TMI Health Physics Procedure  
1616. Rev. 8, Use of Respiratory  
Protection Devices

Sat      Unsat

Remarks

- |   |   |   |  |
|---|---|---|--|
| 1. Evidence that defective respiratory equipment is removed from service until repaired.<br>(Section 2.2)   | — | — | Couldn't verify because needed TLD to get into area where defective equip is stored  |
| 2. For regulatory pressure gauges is the minimum starting pressure approximately 1800 psi?<br>(Section 5.1.2.1)   | ✓ | — |  |
| 3. Evidence that any individual who may be required to wear respiratory protective devices has been instructed via a training course, with a record of these individuals, date of training, and type of instruction maintained by the Training Department.<br>(Section 5.8.1) | ✓ | — | TMI sta STAFF Training Studies for GET (respiratory) name & date included in GET schedule or audit also through regular program. |
| 4. Evidence that a test fitting of each individual is conducted in a smoke or other suitable atmosphere to insure that the respirator will properly fit each individual.<br>(Section 5.8.2.1)   | ✓ | — |  |
| 5. Emergency Respiratory Equipment:   |   |   |  |
| a. Evidence that this equipment is sealed in its kit and reserved for emergency use only.<br>(Section 5.9.1)  | ✓ | — |  |
| b. Are all emergency respiratory equipment kits that are listed on Form 1616-1 inspected every month and is the report reviewed by the Radiation Protection Foreman.<br>(Section 5.10.1 and 5.10.14)  | ✓ | — | Verified for Jan & Feb 1978  |
| c. Evidence of kit inspection record tags being utilized.<br>(Section 5.10.13)  | ✓ | — |  |
| 6. Is a separate Form 1616-3 being completed as required for each individual entering an area or airborne contamination exceeding MPC values?<br>(Section 5.12.3.1)   | — | — | Have it hand to use to date  |
| 7. Is Form 1616-3 filed in the Personnel MPC Hours Log Book?<br>(Section 5.12.3.2)  | — | — |  |

Sat      Unsat      Remarks

8. Evidence that respiratory equipment is used by individuals with shaven faces and where nothing interferes with the seal of tight-fitting face pieces against the skins (hoods and suits are excepted) (Section 12.10 and ANSI 8.15, Table 1)

✓      —  
 Individual must have a sat physical exam and pass the test booth before being allowed to use respirator

9. Table 1646-1 Protection Factors for respirators are not in all cases consistent with ANSI 8.15, Table 1, i.e. airline respirator, face piece, Mode D; self contained breathing apparatus, SCBA face piece full, modes D and R, respectively.

—      ✓  
 Finding 6

Prepared by A. T. Tribble  
 A. T. Tribble (Team Member)

Date 3/15/78

Prepared by T. F. Barbagallo  
 T. F. Barbagallo (Team Leader)

Date 3/15/78

Approved by P. A. Levine  
 P. A. Levine (Lead Audit Eng.)

Date 3/15/78

Completed by A. T. Tribble  
 A. T. Tribble

Date 3/31/78

T. F. Barbagallo  
 T. F. Barbagallo

Date 3/31/78

TABLE 1  
PROTECTION FACTORS FOR RESPIRATORS<sup>1</sup>

DESCRIPTION <sup>b</sup>	MODES <sup>c</sup>	PROTECTION FACTORS <sup>d</sup>		SELECTION OF TESTED & CERTIFIED EQUIPMENT
		PARTICULATES ONLY	PARTICULATES, GASES & VAPORS <sup>e</sup>	BUREAU OF MINES/NATIONAL INSTITUTE FOR OCCUPATIONAL SAFETY AND HEALTH APPROVALS
<b>I. AIR-PURIFYING RESPIRATORS</b>				
Facepiece, half-mask <sup>f</sup>	NP	10	}	30 CFR Part 11 Subpart K
Facepiece, full	NP	50		
Facepiece, half-mask, full, or hood	PP	1000		
<b>II. ATMOSPHERE-SUPPLYING RESPIRATORS</b>				
<b>1. Air-line respirator</b>				
Facepiece, half-mask	CF		1000	30 CFR Part 11 Subpart J
Facepiece, half-mask	D		10	
Facepiece, full	CF		2000	
Facepiece, full	D		50	
Facepiece, full	PD		2000	
Hood	CF		2000 <sup>g</sup>	
Suit	CF		h	
<b>2. Self-contained breathing apparatus (SCBA)</b>				
Facepiece, full	D		50	30 CFR Part 11 Subpart H
Facepiece, full	PD		10,000 <sup>j</sup>	
Facepiece, full	R		50	
<b>III. COMBINATION RESPIRATOR</b>				
Any combination of air-purifying and atmosphere-supplying respirators		Protection factor for type and mode of operation as listed above		30 CFR Part 11 § 11.63(b)

<sup>1</sup>For use in the selection of respiratory protective devices to be used where the contaminant has been identified and the concentration (or possible concentration) is known.

<sup>2</sup>Only for shaved faces and where nothing interferes with the seal of tight-fitting facepieces against the skin. (Hoods and suits are excepted.)

<sup>3</sup>The mode symbols are defined as follows:

- CF = continuous flow
- D = demand
- NP = negative pressure (i.e., negative phase during inhalation)
- PD = pressure demand (i.e., always positive pressure)
- PP = positive pressure
- R = demand, recirculating (closed circuit)

<sup>4</sup>The protection factor is a measure of the degree of protection afforded by a respirator, defined as the ratio of the concentration of airborne radioactive material outside the respiratory protective equipment to that inside the equipment (usually inside the facepiece) under conditions of use. It is applied to the ambient airborne concentration to estimate the concentration inhaled by the wearer according to the following formula:

$$\text{Concentration Inhaled} = \frac{\text{Ambient Airborne Concentration}}{\text{Protection Factor}}$$

2. The protection factors apply:

(a) Only for trained individuals wearing properly fitted respirators used and maintained under supervision in a well-planned respiratory protective program.

(b) For air-purifying respirators only when high efficiency particulate filters (above 99.97% removal efficiency by thermally generated 0.3 um dioctyl phthalate (DOP) test) are used in atmospheres not deficient in oxygen and not containing radioactive gas or vapor respiratory hazards.

(c) For atmosphere-supplying respirators only when supplied with adequate respirable air.

<sup>5</sup>Excluding radioactive contaminants that present an absorption or submersion hazard. For tritium oxide, approximately one half of the intake occurs by absorption through the skin so that an overall protection factor of less than 2 is appropriate when atmosphere-supplying respirators are used to protect against tritium oxide; for example:

If the protection factor for a device is:	PF overall for tritium oxide is:
10	1.82
100	1.98
1,000	1.99

(Continued)

AUDIT PLAN 78 - 07

RESPIRATORY PROGRAM (NUCLEAR)

I. PURPOSE AND SCOPE

The purpose and scope of this audit is to determine the adequacy of and compliance with the applicable respiratory program/procedures for TMI, Units 1 and 2.

II. REFERENCE DOCUMENTS

1. 10CFR 20.103, Exposure of Individuals to Concentrations of Radioactive Materials In Air In Restricted Areas.
2. Regulatory Guide 8.15, Acceptable Program For Respiratory Protection.
3. NUREG-0041 (Final), Manual of Respiratory Protection Against Airborne Radioactive Materials.
4. Health Physics Procedure 1616, Revision 8, Use of Respiratory Protective Devices.

III. PLAN

1. Evaluate HPP 1616 to determine adequacy in light of the requirements imposed via the above noted reference standards.
2. Prepare check list to cover the reference documents, as appropriate.
3. Conduct audit and part audit reviews.



# METROPOLITAN EDISON COMPANY

Subsidiary of General Public Utilities Corporation

Subject RESPIRATORY PROTECTION PROGRAM AT TMI

Location Reading

To R. O. KEEM

Date November 21, 1977  
GAM 4587

To confirm our discussion of November 17, 1977, we:

1. Resolved that the subject program is essential at TMI for continued economical station operation and the safety of our personnel.
2. Resolved that total compliance to 10CFR20.103, Reg. Guide 8.15 and NUREG ~~41~~ is mandatory by December 28, 1977.
3. Resolved that to be in compliance with the reference documents in #2 above, it is Met-Ed Co.'s responsibility to enforce the requirements of the reference documents in #2 above.
4. Resolved that employees whose position/classification requires the use of respiratory protective equipment shall successfully complete the prescribed training and testing requirements in the reference documents in #2 above.
5. Resolved that management will provide the direction required for answering the questions of involved Generation employees or their representatives as to the disposition of employees who do not successfully complete the prescribed training and test requirements.
6. Resolved that we will attempt to have a complete, solid program by approximately December 6-7, 1977.
7. Resolved that we will present the program to:

	<u>Target Date</u>
a. Generation Managers and approp. Dept. Heads	12-12-77
b. Station Management Staff	12-15-77 A.M.
c. Local 563 Officers	12-15-77 P.M.
d. Station Staff	12-16-77
8. Completion of 7d above is planned for December 16, 1977.

*F. H. Grice*  
F. H. GRICE  
EXT. 107

FHG:lw

cc: R. Dubiel                    W. S. Poyck  
     J. G. Herbein                W. E. Potts  
     → L. L. Lawyer                G. J. Troffer  
     → G. P. Miller

File: 63.0012.0000

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject AUDIT NOTICE, RESPIRATORY PROGRAM-NUCLEAR (78-07)

Location Reading  
Date February 16, 1978  
GQM 0658

To F. H. GRICE

The subject audit will be conducted during the week of 2/26/78 and 3/5/78 by T. F. Barbagallo and A. T. Tribble of the OQA Department.

The purpose and scope of the audit is to determine the adequacy of and compliance with the applicable respiratory program/procedures for TMI Station, Units 1 and 2.

The specific dates for auditing will be arranged by telephone.

*T. F. Barbagallo*  
T. F. Barbagallo  
Ext. 168

TFB:jmr

- cc: G. J. Troffer
- R. N. Prabhakar
- P. A. Levine
- W. W. Cotter
- H. E. Bodden
- J. P. O'Hanlon
- L. L. Lawyer
- G. P. Miller

File: 02.0002.0018.0004

*I have been with F. H. Grice  
on 2/15/78 and the audit  
will be performed on 2/26/78  
3/5/78, at which time the  
the Respiratory Program should be  
fully implemented. T. Barbagallo*

METROPOLITAN EDISON COMPANY Subsidiary of General Public Utilities Corporation

Subject RESPIRATORY PROTECTION PROGRAM

Location TMI Nuclear Sta.  
Middletown, Pa.  
Date February 24, 1973

To TMI STAFF

The purpose of the respiratory protection program is to provide the maximum protection for employees working under conditions where environmental isolation may be required to perform work with an absolute minimum of a physiological hazard. This is effected by attaining compliance with:

1. 10 CFR 20; Standards for Protection Against Radiation.
2. NRC Regulatory Guide 8.15; Acceptable Programs for Respiratory Protection.
3. Nureg 0041; Manual of respiratory protection against airborne radioactive materials.

In order to ensure that employees who may be required to wear respirators can safely and properly utilize them, each assigned individual will be exposed to two (2) key screening examinations:

1. The first is an evaluation whereby workers will be periodically evaluated through diagnostic health screening by competent medical personnel to ensure that they are physically and mentally able to wear respirators under simulated and actual working conditions.
2. The second is an actual evaluation conducted while wearing a respirator in a testing booth. The purpose is to determine that the wearer can and does obtain a proper seal to minimize inhalation of contaminants. The respirator worn during this test is similar to those found in the plant. During the course of the test, the actual effectiveness of the respirator seal can be precisely measured by drawing a sample from the air the wearer is breathing, and weighing this against the known concentration of test medium in the booth. To obtain the required seal, the respirator must contact the wearer's face with an absolute minimum of interference, such as facial hair.

Positions affected by the respiratory protection program:

Selected Engineers, Training and Support Personnel

Designated personnel on loan to TMI

Designated contractor personnel

TMI Staff  
February 24, 1978

All of the following personnel:

Quality Control (except administrative)

Safety

Health Physics/Chemistry

Operations

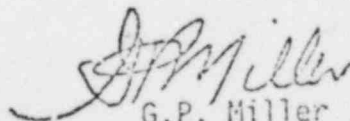
Maintenance

Superintendents

Specifics of implementation:

1. Positions listed above shall receive the periodic medical surveillance screening examination, and functional booth testing.
2. Unless satisfactory completion of the two (2) screening evaluations is accomplished and maintained current, individuals will not be issued respirators nor allowed to enter any area in which respiratory protection is required.
3. Personnel listed above shall report to work clean shaven each day.
4. Satisfactory completion and qualification of the respiratory protection program shall be a requirement for the positions listed above.
5. Positions/personnel may be added or deleted from the scope of the respiratory protection program as station needs dictate.
6. Variances or deviations from portions of the respiratory protection program will be evaluated on a case basis.

Please join me in pursuit of the safest working environment that we can attain.



G.P. Miller  
Unit 2 Superintendent/  
Station Superintendent

GPM/EFG/dmn

cc: N.R. Danfelt  
F.H. Grice  
J.G. Herbein  
T.L. Hombach

R.O. Keim  
L.L. Lawyer  
H.L. Robidoux

TO

P.A. Varne

METROPOLITAN EDISON CO.

Assignees  
TE

12/14/77 Due Date 3/31/78

REC 27 77 P.M. SPEED MEMO  
GQM-4997

M E S S A G E

Sub: Audit Request

Per attached memo (Fred Grist to Jack Haberman at T-), please schedule an audit at TME to verify compliance with RG 8.15 & NUREG 0041 (Respiratory program). The audit should preferably be conducted either in late January or early February 78 and report published before 3/31/78.

WJ Yes.

AI/SR: NO. Sig. YES. (WJ)

Attached: Yes.

L.B.P.

Please reply to

SIGNED:

R E P L Y

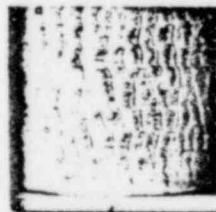
cc: W.W. Cotton }  
Fred Grist } No attachment  
G. J. Trojfer }

DATE:

SIGNED:

1st & 2nd Copy - For Person Addressed - 2nd Copy to be Returned to Sender.  
3rd Copy - Detach and Retain for Answer.

MF-169 3-76



# Respiratory Program

ST  
PIP del

To: JGH

WMC

WHAT IS THE NEXT MOVE?

Time table is on GAM 4587 attached. When item #5 is completed - answer from HLR/ROK - we will schedule mtg with JGH, Gen mgrs and approp section heads for ~ 12-12-77 to begin education process. I am planning to bounce presentation off G.J.T. and W.S.P. prior to 12/12/77.

## Presently underway is:

1. PCR's to HP procedures to bring us procedurally in compliance (will use TCW's if no POS) RWD by 12/16/77
2. Set up test booth and equip, check out & train H.P. Personnel to operate RWD by 12/23/77
3. Determine by name/classification which employees require resp. prot. completed FHG
4. Contract for Physical Exam of employees completed FHG
5. Issuing of approp pers and RG 8.15 etc (ingit & L5) F.H.G. by 12/16/77
6. Order add'l equipment req'd for compliance F.H.G. by 12/9/77

DRAFT From:

J. G. HERBEIN

November 16, 1977

TO: F. H. GRICE

RE: Respiratory Program

December 29th is the date by which we have committed to R. G. 8:15 on Resp. Protection.

Please outline your recommended program sequence by milestone and date to insure our compliance with the "Respirator Seal" portion of the Reg. Guide.

I have previously forwarded your last draft memo -- unsigned with an explanatory note -- indicating my feelings that we would soon have to comply with R.G. 8:15.

In preparing your milestones and dates, consider very carefully the educational process we must go through -- first with our Key Managers and Supts. and then with the IBEW leadership and finally our hourly employees.

You should work with Walt Poyck on this and at some point I'll expect you and Walt to brief R. O. Keim on this for me.

JGH

J. G. Herbein

:dkf

cc: T. A. Jenckes  
L. L. Layner  
G. P. Miller

Tickler: 12-1-77

What is the  
next move?

H. K.