



*Proposed by 12/77*  
*Re. SA*

METROPOLITAN EDISON COMPANY  
SUSTAINED BY GENERAL PUBLIC UTILITIES CORPORATION

POST OFFICE BOX 542 READING, PENNSYLVANIA 19603

TELEPHONE 215 - 929-3601

March 16, 1977  
GQL 0340

### Regulatory Docket File



Mr. J. P. O'Reilly  
U. S. Nuclear Regulatory Commission  
Office of Inspection & Enforcement  
Region 1  
631 Park Avenue  
King of Prussia, PA 19406

Dear Sir:

Three Mile Island Nuclear Station Unit 2 (TMI-2)  
License No. CFP-66  
Docket No. 50-320  
Inspection Report No. 50-320/77-02

This letter is in response to the subject inspection report resulting from Mr. Narrow's inspection of January 10 through 13, 1977 and the findings thereof. Response is given below to the infractions identified in the report.

Apparent Infraction 77-02-01:

Nonconforming conditions in Emergency Feedwater and Main Steam Lines.

"Contrary to 10CFR50, Appendix B, Criterion X, Sections of the emergency feedwater and main steam lines which had been accepted by Field QC did not conform to the drawings and specifications."

Response to Apparent Infraction (Emergency Feedwater):

**POOR ORIGINAL**

The emergency feedwater line had been inspected for phase I turnover and accepted. The NRC inspector found that hanger EPH-458 did not have the clearance specified on Bergen-Paterson Drawing No. 1691-1. Hanger EPH-458 had been previously inspected during QC phase I inspection and was found to have been installed in accordance with the requirements of Bergen-Paterson Drawing No. 1691-1. However, at the time of phase I inspection, the piping was not complete in that certain spool pieces were missing (as documented on the phase I punch list). Subsequent to the QC phase I inspection, but prior to the NRC inspection, the piping department installed missing spool piece 2-EP-33. It is concluded that during this installation the clearance on hanger EPH-458 was changed.

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Paragraph 5b of the inspectors detailed report describes the inspector's observation that ECP-3-2 did not conform to Burns & Roe specification 2555-70 and that cables in circuit HH30P had been accepted by the QC inspector without heat shrink insulation.

In March, 1976, Burns & Roe issued ECM 3416 which established the requirement for the heat shrink insulation. Burns & Roe specification 2555-70 was not revised to incorporate this FCM until November, 1976. The ECP was not revised when the ECM was issued as explained above. However, a normal part of the QC phase I inspection is a separate review made to ensure that appropriate inspections are performed to determine compliance with outstanding ECM's. At the phase I inspection of circuit HH30P this was done and the QC inspector had in fact rejected the circuit for lack of heat shrink insulation.

Action Taken:

1. ECP-8-2 has now been revised to comply with Burns & Roe specification 2555-70.
2. ECP-3-2 will be revised to comply with Burns & Roe specification 2555-70 by March 30, 1977.
3. An inspection for heat shrink insulation has been added to the phase I QC checklist for electrical inspections.

Steps Taken to Avoid Future Recurrence

None required.

As construction activities focus more on tasks leading directly to fuel loading and eventually to commercial operation, we are as concerned as the NRC that these schedule pressures not result in any degradation in the Quality Assurance program at TMI-2. Both Quality Assurance and Project Management personnel are committed to see that degradation does not happen. Since December 1976 we have taken the following specific steps:

1. A total of 15 first level inspection personnel have been added to the TMI-2 Quality Control staff. This increase has been predominantly in the electrical/instrumentation area (9).
2. One additional Quality Assurance Engineer has been assigned to the phase I documentation review and turnover activity.
3. Overtime has been authorized for Quality Assurance Engineers to insure thoroughness of review and minimum quality risk from schedule pressures.
4. Specific policy guidance has been reiterated to QC inspection, and site construction and management functions, concerning proper interfacing of construction and test schedules with site quality control. This policy attempts to minimize schedule pressure on first level inspection personnel.

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