

Metropolitan Edison Company
Post Office Box 480
Middletown, Pennsylvania 17057
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Writer's Direct Dial Number

February 5, 1980
TLL 041

Office of Inspection and Enforcement
Attn: Boyce H. Grier, Director
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit II (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Inspection Report 79-29

This letter is in response to the subject inspection report dated January 9, 1980. The attachment discusses our response to the apparent infraction concerning the transfer of licensed material off site.

Sincerely,

/s/ R.F. Wilson
R. F. Wilson
Director, TMI-II

RFW:DGM:hah

Attachment

8008120297

RESPONSE TO APPARENT INFRACTION

- A. Corrective steps which have been taken to avoid further items of noncompliance in the area of Storage and Control of Licensed Material in Unrestricted Areas.
- 1) The trash control system now in effect requires that all waste be surveyed prior to disposal either via trash compactor or dumpsters. To ensure this requirement is followed, trash compactor keys are maintained by the Radiological Controls Department; the compactor is operated only with RC personnel present and all trash (compactibles as well as wood and metal) is inspected and surveyed prior to disposal.
 - 2) Personnel monitoring vehicles and materials leaving the protected area have been instructed on techniques and instrumentation used in surveying for radioactive material. These monitors now consist of RC personnel, replacing the Auxiliary Operators previously used.
 - 3) All personnel handling industrial waste material have been instructed of the need to properly handle and control radioactive waste by means of packaging material by type (compactible or non-compactible) and identifying the contents of the packages. The identification will not only specify the contents but will also identify the individual who packaged the waste. Additionally, only the Site Operations Decontamination Group is responsible for placing radioactive waste into shipping containers in preparation for disposal.
 - 4) Procedures specifying the requirements for shipment and receipt of radioactive material have been revised. The revised requirements ensure that all shipments and receipt of radioactive materials are handled in accordance with applicable regulatory agency requirements.
- B. Corrective steps which will be taken to avoid further items of noncompliance in the area of Storage and Control of Licensed Material in Unrestricted Areas.
- 1) The procedures for use of 55 gallon drums for radioactive materials will be revised to require segregation of laundry items from waste and equipment items by color coding the drums. White drums will only be used for radioactive waste and for shipment of radioactive materials, and Black (or any other color except white or yellow) drums will be used for any other purpose (i.e., non-radioactive trash, non-radioactive material storage, etc.). Control of these yellow and white drums will be by tagging as "radioactive" or "non-radioactive" per the Radioactive Material Accountability procedure (see item 2 below on the status of this procedure). The estimated date for implementation of this system is 2/15/80 pending receipt of new color coded drums on site 2/1/80.
 - 2) Procedures specifying the requirements for packaging and accountability of Radioactive material have been revised and are now being reviewed. The estimated issue date for these procedures and implementation of the requirements is 3/1/80.

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- C. Implementation of the measures as specified in A. above has resulted in control of radioactive material to a level where status is known at all times and assures that further items of noncompliance as identified in the subject Notice of Violation will not occur.

Implementation of the measures as specified in B. above will further enhance the control and accountability levels of assuredness that radioactive material will be properly handled and in full compliance, as a minimum, with applicable regulations.



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION I
631 PARK AVENUE
KING OF PRUSSIA, PENNSYLVANIA 19406

JAN 9 1980

Docket Nos. 50-289
50-320

Metropolitan Edison Company
ATTN: Mr. R. C. Arnold
Sr. Vice President
100 Interpace Parkway
Parsippany, New Jersey 07054

Gentlemen:

Subject: Combined Inspection 50-289/79-21; 50-320/79-29

This refers to the inspection conducted by Mr. R. McGaughy of this office on October 23-November 27, 1979, at Three Mile Island Nuclear Station, Units 1 and 2, Middletown, Pennsylvania, of activities authorized by NRC License Nos. DPR-50 and DPR-73 and to the discussions of our findings held by Mr. H. Crocker, of this office, with Messrs. J. Herbein, R. Wilson and other members of your staff at the conclusion of the inspection.

Areas examined during this inspection period are described in the Office of Inspection and Enforcement Inspection Report which is enclosed with this letter. Within these areas, the inspection activities consisted of selective examinations of procedures and representative records, interviews with licensee and contractor personnel, measurements made by the inspectors, and observations by the inspectors. NRC personnel provided 24 hour per day inspection coverage on site during this period.

Based on the results of this inspection, it appears that one of your activities was not conducted in full compliance with NRC requirements, as set forth in the Notice of Violation, enclosed herewith as Appendix A. This item of noncompliance has been categorized into the levels as described in our correspondence to you dated December 31, 1974. This notice is sent to you pursuant to the provisions of Section 2.201 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations. Section 2.201 requires you to submit to this office, within twenty (20) days of your receipt of this notice, a written statement or explanation in reply including: (1) corrective steps which have been taken by you and the results achieved; (2) corrective steps which will be taken to avoid further items of noncompliance; and (3) the date when full compliance will be achieved.

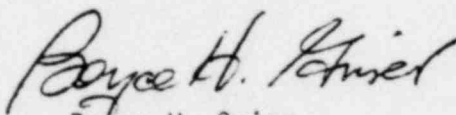
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In accordance with Section 2.790 of the NRC's "Rules of Practice," Part 2, Title 10, Code of Federal Regulations, a copy of this letter and the enclosures will be placed in the NRC's Public Document Room. If this report contains any information that you (or your contractor) believe to be proprietary, it is necessary that you make a written application within 20 days to this office to withhold such information from public disclosure. Any such application must be accompanied by an affidavit executed by the owner of the information, which identifies the document or part sought to be withheld, and which contains a statement of reasons which addresses with specificity the items which will be considered by the Commission as listed in subparagraph (b)(4) of Section 2.790. The information sought to be withheld shall be incorporated as far as possible into a separate part of the affidavit. If we do not hear from you in this regard within the specified period, the report will be placed in the Public Document Room.

Should you have any questions concerning this inspection, we will be pleased to discuss them with you.

Sincerely,



Boyce H. Grier
Director

Enclosures:

1. Appendix A, Notice of Violation
2. Office of Inspection and Enforcement Combined Inspection Report
Numbers 50-289/79-21 and 50-320/79-29

cc w/encls:

J. G. Herbein, Vice President-Nuclear Operations
R. F. Wilson, Director-TMI-2
G. P. Miller, Manager, Unit 1
J. J. Barton, Manager Site Operations
J. J. Colitz, Manager Plant Engineering (TMI-1)
B. Elam, Manager Plant Engineering (TMI-2)
L. W. Harding, Supervisor of Licensing
E. G. Wallace, Licensing Manager
I. R. Finfrock, Jr.
R. W. Conrad
G. F. Trowbridge, Esquire
J. B. Lieberman, Esquire
Ms. Mary V. Southard, Chairperson, Citizens for a Safe Environment (Without Report)

APPENDIX A

NOTICE OF VIOLATION

Metropolitan Edison Company

Docket No. 50-320

Based on the results of an NRC inspection conducted on October 23 - November 27, 1979, it appears that one of your activities was not conducted in full compliance with the conditions of your NRC Facility License No. DPR-73 as indicated below. This is an infraction.

10 CFR 20.207, "Storage and Control of Licensed Materials in Unrestricted Areas," states, "(a) Licensed materials stored in an unrestricted area shall be secured from unauthorized removal from the place of storage. (b) Licensed materials in an unrestricted area and not in storage shall be tended under the constant surveillance and immediate control of the licensee."

Contrary to the above, on November 15, 1979, at least two steel drums of licensed material (dry waste mistaken to be non-radioactive) were transferred to a vendor for transport and disposal at the Harrisburg, Pennsylvania, city refuse dump, an unrestricted area. The steel drums were rejected by the operator of the disposal facility and subsequently transported by the vendor to his warehouse in Elizabethtown, Pennsylvania, for overnight storage. On November 16, 1979, the vendor returned the two drums to the Three Mile Island facility where the drums were surveyed by the licensee and found to have radiation levels of 0.5 and 3.0 mRem/hour, respectively. During this period of time, the above requirements were not met.

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U.S. NUCLEAR REGULATORY COMMISSION
OFFICE OF INSPECTION AND ENFORCEMENT

Region I

Report No. 50-289/79-21
50-320/79-29

Docket No. 50-289'
50-320

License No. DPR-50 Priority -- Category C
DPR-73 C

Licensee: Metropolitan Edison Company
100 Interpace Parkway
Parsippany, New Jersey 07054

Facility Name: Three Mile Island Nuclear Station, Units 1 and 2

Inspection at: Middletown, Pennsylvania

Inspection conducted: October 23 - November 27, 1979

Inspectors: *D.R. Haverkamp* 12/20/79
D. R. Haverkamp, Reactor Inspector date signed
R.J. Conte 12/20/79
R. J. Conte, Reactor Inspector date signed
G.P. Greger 12/20/79
L. R. Greger, Senior Radiation Specialist date signed
G.P. White 12/20/79
J. R. White, Senior Radiation Specialist date signed
G.P. Yuhas 12/20/79
G. P. Yuhas, Senior Radiation Specialist date signed
Approved by: *E.C. McCabe, Jr.* 12/20/79
R. W. McGaughy, Acting Chief, Site Operations date signed
Section, TMI Site Office

Inspection Summary:

Inspection on October 23 - November 27, 1979 (Combined Report Nos. 50-289/79-21; 50-320/79-29)

Areas Inspected: Special inspection by NRC TMI Site staff of: licensee action on previous inspection findings (Units 1 and 2), new and revised procedures (Unit 2); plant operations including shift activities as monitored by NRC shift inspectors (Units 1 and 2); fire drill at operating experience and health physics physics including documentation, posting

The inspection included continuous shift Results: Of the six areas inspected, one area (Infraction - failure to store and c areas, Paragraph 8.c).

DUPLICATE DOCUMENT

Entire document previously entered into system under:

ANO 8007100014

No. of pages:

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