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August 14, 1980
TLL 369

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

Dear Sir:

Three Mile Island Nuclear Station, Unit I and II (TMI-1 and TMI-2)
Operating License Nos. DPR-50 and DPR-73
Docket Nos. 50-289 and 50-320
Inspection Report Nos. 50-289/79-23 and 50-³²⁰~~230~~/79-28

Enclosed please find an additional response to the subject Inspection Report as requested in your letter of July 11, 1980.

Sincerely,

Signed J. G. Herbein

J. G. Herbein
Vice President
TMI-I

JGH:DGM:lma

Enclosure

cc: J. T. Collins
R. W. Reid
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Infraction A

Section 4.4a and Table 3 of the Unit 1 Environmental Technical Specifications (ETS) and Section 3.2 and Table 3.3-2 of the Unit 2 ETS require, in part, that specified numbers of samples of air particulates and air iodines be collected and analyzed on a weekly basis.

INF.A (1) and (2). Contrary to these requirements several air particulate samples and several air iodine samples were not collected and analyzed. Thus fewer than the required number of each were performed for the specified time interval.

Response A

The TMI Environmental Impact Assessment (TMI/EIA) Group, formed on September 15, 1979, was developed to strengthen our control system by ensuring the effectiveness of our environmental operating procedures. This group has implemented the following controls to prevent recurrence of the apparent infractions.

- A(1). Additional air sampling equipment was purchased in December 1979 and available for placement in the field in January 1980.
- A(2). The air sampling period is weekly from Tuesday to Tuesday. A surveillance of the equipment is performed on Fridays, approximately midway during the sampling period. Therefore, the longest period of time that an equipment malfunction could be undetected is 3½ days.
- A(3). Upon detection of an equipment malfunction, the appropriate personnel at TMI are contacted to initiate repair. This notification process has been simplified by being performed directly by the TMI/EIA Group. The length of time required for repair largely is dependent on the nature of the malfunction but should be corrected within five days. Problems of a minor nature should be corrected within 24 hours.

Infraction B

Section 4.4a and Table 3 of the Unit 1 ETS and Section 3.2 and Table 3.2-3 of the Unit 2 ETS require, in part, that all samples be analyzed with sufficient sensitivities to meet the minimum specified analytical sensitivities.

INF.B (1) and (2). Contrary to these requirements, air samples and drinking water samples at specified locations and times were not analyzed with sufficient sensitivity for I-131.

Response B

The TMI/EIA Group REMP data management system provides three levels of review within the Group. The initial review is completed within 24 hours of the receipt of the data from the laboratories. All three reviews are completed within one week of receipt of the data. Additionally, an annual audit is performed of the laboratories. RMC Laboratory was audited on December 14, 1979, and Teledyne Laboratory was audited on January 18, 1980.

The potential for loss of analytical sensitivity owing to delayed sample delivery has been eliminated through the transport of samples to the laboratories by the TMI/EIA Group. This practice was first initiated by consultants to Metropolitan Edison in June 1979. The process was assumed and continued by the TMI/EIA Group.

Infraction C

Section 4.4a and Table 3 of the Unit 1 ETS require, in part, that milk samples be collected and analyzed from four indicator and one background station at monthly intervals during the grazing season. Section 3.2 and Table 3.2-2 of the Unit 2 ETS require, in part, that milk samples be collected and analyzed from three indicator and one background station at semi-monthly intervals during the grazing season and monthly at all other times.

Contrary to these requirements, milk samples were not always collected and analyzed at the required frequencies or locations.

This resulted in fewer than the required number of milk samples being collected and analyzed during these time intervals.

Response C

Commercial courier service for the delivery of samples to the laboratories was eliminated in June 1979. Sample collection and delivery are performed by the TMI/EIA Group.

At a minimum, sample collection procedures, techniques, and frequencies are reviewed during the annual audits.

Infraction D

Section 4.4a and Table 3 of the Unit 1 ETS and Section 3.2 and Table 3.2-2 of the Unit 2 ETS require, in part, that water samples be collected at the City of Columbia at the specified frequencies and the specified analyses be performed.

Contrary to these requirements, water samples from the City of Columbia were not collected and analyzed at the specified frequency during the first quarter of 1978.

This resulted in fewer than the required number of samples being collected and analyzed during this time interval.

Response D

Additional water sampling equipment was purchased in December 1979 and available for deployment to the field as replacement units in January 1980. A surveillance check of all composite water sampling equipment is performed weekly. Therefore, the longest period of time that a unit could be out of service is seven days. Any unit not functioning properly would be replaced with a backup unit within 24 hours.

Infraction E

Section 5.3 of the TMI Unit I and II ETS requires, in part, that independent audit and review functions for environmental matters will be performed under the direction and control of the Manager-Generation Engineering. These audits and reviews will encompass, among other things, the results of the Environmental Monitoring Programs prior to their submittal in each Annual Environmental Monitoring Report.

Contrary to these requirements, the results of the Environmental Monitoring Programs

reported to the NRC in the 1978 Annual Environmental Monitoring Reports were not audited.

Response E

Audits were performed on RMC Laboratory on December 14, 1979, Ichthyological Associates, Inc., on December 16, 1979, and Teledyne Laboratories on January 18, 1980. The TMI/EIA Group reviewed all environmental monitoring programs in December 1979 and April 1980.

Infraction F

Section 5.5 of the Unit I and Unit II ETS requires, in part, that detailed written procedures, including applicable checklists and instructions, shall be prepared and followed to implement the environmental technical specifications. Procedures shall include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are exceeded.

INF.F (1). Section 2.2 of the Unit I ETS requires, in part, that the pH of the contents of each tank of neutralized regenerate wastes be determined prior to release and adjusted to specification, if necessary. Additionally, as a minimum, the pH of a sample is taken from the plant river waste discharge during the release of each tank of regenerate wastes, or at weekly intervals.

Contrary to these requirements, as of the dates of inspection, the regenerate neutralizing tank and the plant river water discharge sampling procedures were not prepared as required (Unit 1).

Response F(1)

OP1104-18 and SP1301-9.10 cover all the ETS sampling requirements, including the analysis of water from the regenerated neutralization tank and plant river water discharge. In addition to these procedures, a generic sampling procedure, CP1800.5, was written by June 1, 1980 and will be approved by September 1, 1980. These procedures fulfill the requirements by the ETS.

Infraction F(2)

Section 2.1.6 of the Unit I ETS requires, in part, that if the Unit I Control Room ΔT chart recorder is out of service, the plant inlet and discharge temperatures be obtained from the recorders located in the mechanical draft cooling towers (MDCT).

Sections 5.5.1 and 5.5.2 of the Unit I ETS require, in part, that detailed written procedures be prepared and followed to ensure compliance with the Limiting Conditions for Operation, Section 2 of the ETS, including procedures to be followed in the event that the Unit I Control Room plant ΔT chart recorder is out of service.

Contrary to these requirements, as of the dates of this inspection, written procedures detailing actions to be taken when the Control Room ΔT recorder is out of service were not prepared and followed as required.

Response F(2)

Our prior response stated that the present procedure OP1104-37 supplies adequate guidance when the normal river water ΔT indication is unavailable. Specifically, when normal river water ΔT indications are unavailable, calculate ΔT at least once per hour using available indication of inlet and outlet river water temperature sources. Enter the calculated value in the CRO log.

Therefore: (1) Corrective steps which have been taken by the licensee and the results achieved:

No corrective steps are required per 10CFR2.201 since it remains our contention that this item did not constitute a violation.

(2) Corrective steps which will be taken:

No corrective steps are required per 10CFR2.201 since it remains our contention that this item did not constitute a violation.

(3) The date when full compliance will be achieved:

Full compliance was maintained because the existing procedures satisfy the objective and specification of Section 5.0 of the TMI-I Environmental Technical Specification.

Infraction F(3)

Section 3.1.1.a of the Unit II ETS requires, in part, that during normal operations, the contents of the holding tanks for the demineralizer and condensate polisher regeneration solutions shall be sampled prior to being discharged and pH measured in accordance with the procedures prepared by the licensee per Section 5.5.

Contrary to these requirements, as of the dates of this inspection, procedures for sampling the holding tanks for demineralizer and condensate polisher regeneration were not prepared and followed as required.

Response F(3)

OP2104-2.11 details sampling and analysis of water from the holding tanks for demineralizer and condensate polisher regeneration solutions, which covers Section 3.1.1.a of Unit II ETS. Additionally, a generic sampling procedure was written by June 1, 1980, and is in the review process. This procedure details obtaining the holding tanks samples.

Infraction G

Section 5.5 of the ETS for TMI Unit I and II requires that, "Detailed written procedures, including applicable checklists and instruction, shall be prepared and followed to implement the environmental technical specifications. Procedures shall include sampling, data recording and storage, instrument calibration, measurements and analyses, and actions to be taken when limits are exceeded."

INF.G (1).

The Units I and II Radiological Environmental Monitoring Program (REMP) Surveillance Procedure GP 1402, Rev.0, dated November 15, 1977, requires, in part, that REMP Sample Collection Sheets be completed and distributed as specified in Appendix A of that procedure.

Contrary to these requirements, the REMP Sample Collection Sheets described in the REMP Surveillance Procedure GP 1402, Rev. C, were not completed and distributed as required by Appendix A of the Procedure from April 1979 to the dates of inspection.

Response G(1)

The sample collection sheets are on file and may be reviewed in the office of TMI/EIA Group.

Infraction G(2)

Unit II Operating Procedure No. 2104-2.11 requires that a release permit be completed for each neutralizing tank discharge, which is to include specified data at the start and termination of each tank discharge.

Contrary to these requirements, the neutralizing tank release permits were not completed, as required, for Unit II neutralizing tank discharge on several occasions, including on October 5, 1978, March 1, 2, 3, 4, 5, 6, 7, 8 and 10, 1979.

Response G(2)

Operating Procedure 2104-2.11 was changed on 9/25/79 to incorporate Section 4.3 "Discharge of Neutralizer Tank Contents to the Turbine Building Sump", which gives the operators the necessary direction on completion of release permits. In addition, the above procedure was modified to include the proper disposition of these records by July 15, 1980.

Infraction G(3) and (4)

INF. G(3). Unit I Procedure No. IC39 requires annual calibration of the plant intake/discharge temperature monitoring system.

Contrary to these requirements, the plant intake/discharge temperature monitoring system was not calibrated during 1978 and 1979 as required.

INF. G(4). Unit II Procedure No. 2014-3.8, Rev. 6 assigns to Unit I the responsibility to assure compliance with plant ΔT requirements, including calibrations of the plant intake/discharge temperature monitoring system.

Contrary to these requirements, Unit II procedure 2104-3.8, Rev. 6 was not fully implemented in that the plant temperature monitoring system was not calibrated during 1978 and 1979.

Response G(3) and (4)

Response of May 5, 1980, deemed adequate.

Infraction H

Section 3.1.2a(1) (c) of the Unit II ETS requires that ichthyofauna be sampled to establish population estimates in specific areas and to detect and assess the significance of changes in species composition, relative abundance, seasonal and spatial distribution, condition, and diversity of species as related to TMINS

operation ... This monitoring program shall commence at initial attainment of normal operation of Unit II and continue for a period of at least three years.

Contrary to the above, the required fish studies were not performed during the period from April 1, 1979 through November 26, 1979.

Response H

Response of May 5, 1980, deemed adequate.

Infraction I

Section 5.7.1 of the Unit I ETS requires in part, that records demonstrating compliance with the Limiting Conditions for Operation in Section 2 of the ETS, including plant ΔT records, be retained for the life of the plant.

Contrary to this requirement, records of ΔT measurements were not retained for February 19, 1979.

Section 5.8.6 of the Unit II ETS requires, in part, that records of all data from environmental monitoring, surveillance and study activities required by these ETS shall be made and retained throughout the term of the operating license.

Contrary to this requirement, records of plant ΔT , influent and effluent temperatures, monitoring required by the Unit II ETS, were not retained for March 20, 21, 22, 23 and 24, 1979, during which time the Unit II control room recorder was off-scale.

Response I

Unit II - These records have been located and are on file in the Data Reduction/Retention Department. The delay in locating these records was due to the recent change-over from manual to computerized data retention.

Unit I - (1) Corrective steps which have been taken by the licensee and the results achieved:

No corrective steps are required per 10CFR2.201 since it remains our contention that this item did not constitute a violation.

(2) Corrective steps which will be taken:

No corrective steps are required per 10CFR2.201 since it remains our contention that this item did not constitute a violation.

(3) The date when full compliance will be achieved:

Full compliance was maintained because plant records are available to comply with Section 5.7.1 of the Unit I Environmental Technical Specification.

Infraction J

Section 3.1.1 of the ETS, Unit II, requires, in part, that a nonroutine report, as specified in subsection 5.6.2.b, shall be made if the thermal characteristics of the discharge from outfall serial number 001 fail to comply with relevant

limitations prescribed by the Commonwealth of Pennsylvania and the U. S. Environmental Protection Agency in the certificates and permits issued to the licensee pursuant to the provision of Sections 401 and 402 of PL 92-500, as cited in Section 5.4 of the ETS.

Contrary to these requirements, on March 14, 1979, between 11:45a.m. and 12:40 p.m., the station ΔT exceeded 12^oF, the specified thermal discharge ΔT limit, and this occurrence was not reported to the NRC.

Response J

We have determined that no station ΔT violation occurred on the date specified in the subject inspection report. Therefore, we are contesting the apparent infraction J and feel no further response is required.

Infraction K

Section 2.1 of the TMI Unit I ETS, Limiting Conditions for Operation requires, in part, that during the period between October 1 and March 31, the plant discharge temperatures be no greater than 12^oF above the plant inlet temperature.

Response K

Our previous response to the apparent Infraction K referenced LER 78-31/4T as an adequate answer. Therefore:

- (1) Corrective steps which have been taken by the licensee and the results achieved:

Refer to Licensee Event Report 78-31/4T dated December 4, 1978.

- (2) Corrective steps which will be taken:

See (1) above.

- (3) The date when full compliance will be achieved:

See (1) above.