

Writer's Direct Dial Number

September 25, 1980  
TLL 453

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

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
Inspection Report 50-320/80-09

This is in response to your letter of August 5, 1980, "Inspection 50-320/80-09" and addresses each of the four (4) items of noncompliance.

ITEM A

". . . On March 29, 1980, the required fire protection procedures were not implemented during open-flame cutting operating in the Fuel Handling Building. . .". Specifically, Fire Protection Procedure 1410-Y-26 was not followed in five (5) different areas by a contractor.

RESPONSE

This noncompliance was by a contractor performing work which he had not done previously at TMI. He was not familiar with Procedure 1410-Y-26. Immediate corrective action taken was to stop all grinding, welding, and open-flame cutting until there was full assurance that the contractor was fully cognizant of the then-current revision of Fire Protection Procedure 1410-Y-26. It was established that all contractors' supervision would approve, in advance, all such activities and require that they be in compliance with 1410-Y-26. As an interim step, the Manager, Construction, has been instructed, by letter, to ensure that positive control of cutting, welding, grinding, and/or open framework is exercised by all parties performing such activities during construction and/or modification efforts, all E.C.M. (Engineering Change Memorandum) packages, and W.A.N.s (Work Authorization Notice) issued for construction should formally involve the existing MP 1410-Y-26." Finally, the TMI-2 Engineering Modification and Construction Authorization Procedures are currently being revised and will include the same requirements. This revision should be complete by November 30, 1980. We believe that we are now in compliance with this item. The procedure change will be accomplished as noted to formalize this matter.

ITEM B - ITEM C

". . .On May 20, 1980. . .for approximately 5-10 minutes containment integrity was not maintained at reactor building personnel airlock No. 2 with the outer door manual purge valve. . .and the inner door manual equalization valve open simultaneously. . ."

". . .On May 29, 1980, the only RCS pressure indications were not operable because of inadvertant closure of a recovery system interface valve (SNS-V26) which isolated two pressure reading instruments from the RCS. . ."

RESPONSE

Both of these items have been addressed in detail in LERs. Item B was documented in LER 80-020/01L-0, dated June 26, 1980. Item C was documented in LER 80-024/03L-0, dated June 30, 1980. However, in your August 5, 1980, letter you ask that we describe "those actions taken or planned to improve the effectiveness of your management control system in this area". (Our management control system that permitted the subject procedures to be approved and implemented). Management has recognized the need for greater in-depth review of proposed procedures. The Plant Operations Review Committee (PORC) has placed increased emphasis on strengthening procedure reviews not only by the PORC, but also by cognizant members of the plant staff.

This action is now in effect and will continue. Accordingly, we believe we are now in compliance.

ITEM D

". . .between May 20 and May 29, 1980, required reports to the NRC Operations Center were not made as noted below:"

"On May 20, 1980, during the reactor building entry procedural implementation, containment integrity was not maintained. . . for a period of approximately 5-10 minutes. The NRC Operations Center was not notified until. . .May 23, 1980, exceeding the one (1) hour limit for notification. . ."

"On May 29, 1980, a procedure was implemented and caused the violation of the only operable source of pressure indication for the reactor coolant system (RCS)." "The NRC Operations Center was not notified. . ."

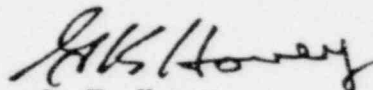
RESPONSE

This item resulted from differences in interpretation between Licensee and the NRC as to the degree of significance of an incident which requires reporting to the NRC as a "significant event". The Licensee was acting in good faith and did report the first event above on May 23 as a "prompt reportable" event. This need can be attributed to a gray area in which many incidents fall on which there is uncertainty as to whether or not a report should be made. We are taking the NRC treatment of the above incidents as guidance to help us "calibrate" the "gray area" to narrow it. We have given wide distribution to the NRC Supplement, dated July 29, 1980, to IE Information Notice 80-06.

The NRC, in its July 29, 1980, Supplement to IE Information Notice, stated, "Experience so far with notification being made in accordance with §50.72 also suggest the need for clarification and more definitive guidance."

In conclusion, we believe we are now in full compliance in the areas treated above.

Sincerely,



G. K. Hovey  
Director, TMI-2

GKH:RIN:SDC:dad

cc: John T. Collins  
Bernard J. Snyder