



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

Tic

1980 DEC 15 PM 10 55

Docket No. 50-289

NOV 28 1980
DISTRIBUTION SERVICES
BRANCH

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

Gentlemen:

Subject: Health Physics Evaluation

The NRC has identified a need for licensees to strengthen the health physics programs at nuclear power plants and has undertaken a significant effort to assure that action is taken in this regard. As a first step in this effort, the Office of Inspection and Enforcement is conducting special team appraisals of the health physics programs at all operating power reactor sites, which include the health physics aspects of radioactive waste management and onsite emergency preparedness. The objectives of these appraisals are to evaluate the overall adequacy and effectiveness of the total health physics program at each site and to identify areas of weakness that need to be strengthened.

During the period of July 28 - August 8, 1980, the NRC conducted a special evaluation of the health physics program at Unit 1 of the Three Mile Island (TMI) Nuclear Station. The major portion of this evaluation was conducted using the same appraisal techniques and acceptance criteria for the same areas as are being used in the conduct of the special team appraisals at operating power reactors throughout the country. Two additional areas were included in the TMI evaluation which are not addressed in the special team appraisals at operating power reactors. The two additional areas reviewed were: 1) your actions to correct items of noncompliance brought to your attention as a result of the investigation into March 28, 1979 accident, the findings of which were documented in NUREG 0600, "Investigation into the March 28, 1979 Three Mile Island Accident By Office of Inspection and Enforcement"; and 2) verification of your implementation of recommendations contained in NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations". Because of these differences, the term "evaluation" is used to distinguish it from the special team appraisals conducted at operating reactors.

Specific areas examined during this special evaluation are described in the enclosed report (50-289/80-22). Within these areas, the evaluation team reviewed selected procedures and representative records, observed work practices,

8012220338

F

NOV 26 1981

and interviewed personnel. The evaluation findings are discussed in detail in the enclosed report.

Based on the findings, the Evaluation Team reached the overall conclusion that the Unit 1 aspects of the health physics program are adequate to support the present level of activities, but there are a number of significant weaknesses which must be corrected to provide reasonable assurance that the program will be adequate during operation and major outages. The significant weaknesses included the following:

1. There was a lack of effective management oversight in assuring that the radiological controls, training and radioactive waste organizations were clearly defined, that personnel were properly selected, qualified and assigned responsibilities for staffing these organizations, and that assigned responsibilities were being carried out.
2. The exposure control program contained discrepancies between Unit 1 and Unit 2 indirect bioassay procedures, exhibited inadequacies in several calibration procedures, lacked action levels for issuance of special monitoring devices, exhibited shortcomings in the maintenance of respiratory protection equipment and had an established quality assurance program which failed to include all monitoring devices and contractor-supplied bioassay services.
3. The solid radwaste shipping program lacked key elements for ensuring the proper use of shipping containers and implementation of the attendant QA requirements.
4. There were incomplete and conflicting actions in relation to resolution of NUREG-0578 items.

Within the portion of the evaluation related to implementation of the Unit 1 draft proposed NUREG 0654 Emergency Plan, the Evaluation Team concluded that significant weaknesses included the following:

1. The lack of clear assignment of individuals to the functional areas of emergency activity;
2. Failure to have a clearly defined program for training individuals who may be assigned emergency duties;
3. Procedures which implement the emergency plan were incomplete, overly general, and exhibited omissions of key elements; and

NOV 26 1980

4. There were facility and equipment shortcomings in relation to the Emergency Operations Facility, Environmental Assessment Center, and reactor building evacuation alarm.

Subsequent to the exit interview on August 8, 1980, various meetings were held with you and members of your staff to discuss the preliminary findings of the health physics evaluation. During these meetings, additional information and preliminary responses were provided by Metropolitan Edison Company in reply to the preliminary findings identified by the Health Physics Evaluation Team. The additional information and preliminary responses provided were reviewed and considered by the Evaluation Team in completing their overall evaluation of the Three Mile Island Unit 1 health physics program. We recognize that, as a result of these discussions, action to resolve the significant weaknesses has been initiated and, in many cases, may have been completed by this time. Our verification of your corrective action will await your formal response to the request in the following paragraph. After receiving your response, all information supplied will be reviewed for its implementation during subsequent inspections.

The significant weaknesses identified must be resolved prior to restart of Unit 1. Items identified as significant weaknesses which must be resolved were selected in a manner consistent with that used in selecting significant weaknesses which must be corrected at operating power reactors where special team appraisals have been conducted. It is requested that you carefully review the 57 items identified as necessitating resolution prior to restart for consideration in effecting improvements in the health physics and emergency planning programs. We recognize that an explicit regulatory requirement pertaining to each significant weakness identified may not currently exist. However, to determine whether adequate protection will be provided for the health and safety of workers and the public, you are requested to submit a written statement within twenty (20) days of your receipt of this letter, describing your corrective action for each of the items requiring resolution prior to restart which are identified in the enclosed report including: (1) steps which have been taken; (2) steps which will be taken; and (3) a schedule for completion of action. This request is made pursuant to Section 50.54(f) of Part 50, Title 10, Code of Federal Regulations.

We note that a number of the significant weaknesses identified are also applicable to Unit 2 because many of the findings for Unit 1 are based on the direct support which elements of the Unit 2 radiological controls and radwaste organizations provide to Unit 1. This matter will be the subject of separate correspondence with respect to Unit 2.

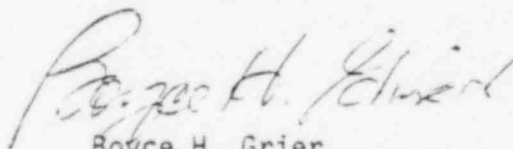
NOV 26 1980

During this evaluation, it was also found that certain of your activities did not appear to have been conducted in full compliance with NRC requirements, as set forth in the Notice of Violation enclosed herewith as Appendix A. The items of noncompliance in Appendix A have been categorized into the levels of severity as described in our Criteria for Enforcement Action dated December 31, 1974. Section 2.201 of Part 2, Title 10, Code of Federal Regulations, 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.

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 five (5) 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 evaluation, 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 Evaluation Report Number 50-289/80-22

NOV 26 1980

cc w/encls:

H. D. Hukill, Director, TMI-1
J. G. Herbein, Director - Nuclear Assurance
R. J. Toole, Manager, Unit 1
J. J. Colitz, Manager, Plant Engineering, Unit 1
L. W. Harding, Supervisor of Licensing
R. F. Wilson, Director - Technical Functions
E. G. Wallace, Licensing Manager
I. R. Finfrock, Jr.
R. W. Conrad
J. B. Lieberman, Esquire
G. F. Trowbridge, Esquire
G. K. Hovey, Director, Unit 2
J. J. Barton, Manager Site Operations, Unit 2
B. Elam, Manager, Plant Engineering, Unit 2
R. W. Heward, Director, Radiological and Environmental Controls
W. E. Potts, Manager, Radiological Controls, Unit 1
J. W. Brasher, Manager, Radiological Controls, Unit 2
Ms. Mary V. Southard, Chairperson, Citizens for a Safe Environment
G. Giangi, Emergency Planning Coordinator, TMI