

APPENDIX A  
NOTICE OF VIOLATION

Metropolitan Edison Company  
Reading, Pennsylvania

Docket Nos. 50-289  
50-320

Based on the results of an NRC inspection conducted on November 6-9, 15-16, 27 and 28, 1979, it appears that certain of your activities were not conducted in full compliance with NRC regulations and the conditions of your NRC Facility Licenses Nos. DPR-50 and DPR-73, as indicated below. Items A, E, F, G and H are categorized as Infractions; the remaining items are Deficiencies.

A. Section 4.4.a and Table 3 of the Unit 1 Environmental Technical Specifications (ETS) and Section 3.2 and Table 3.2-2 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.

(1) Contrary to these requirements, the following environmental air particulates samples were not collected and analyzed weekly for gross beta activity:

TM-AP-7F1	January 11 - February 22, 1978
TM-AP-1S2	April 13 - May 31, 1978
TM-AP-7F1	August 25 - September 1, 1979
TM-AP-7F1	September 8 - September 29, 1979
TM-AP-12B1	September 29 - October 20, 1979

These failures resulted in fewer than the required number of samples being collected and analyzed for these time intervals.

(2) Contrary to these requirements environmental air iodine samples were not collected and analyzed weekly at location TM-AI-1S2 from April 13 to May 31, 1978.

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

B. Section 4.4.a 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.

- (1) Contrary to these requirements, air samples were not analyzed with sufficient analytical sensitivity to meet the specified minimum sensitivities for I-131 at the following locations on several occasions including:

TM-AI-1S2	February 1-9, March 1-15, June 21-29, and July 6-12, 1978
TM-AI-5A1	February 1-9, 15-22, March 1-5, May 25-31, June 21-29, July 6-12, and November 8-15, 1978
TM-AI-8C1	February 1-9, February 15 - March 15, June 7-14, June 21-July 12, and July 26 - August 2, 1978
TM-AI-15G1	February 1-9, 15-22, March 1-8 May 3-11, June 7-14, June 29 - July 12, and October 11-18, 1978

- (2) Contrary to these requirements for Unit 2, drinking water samples were not analyzed with sufficient analytical sensitivity to meet the specified minimum sensitivity for I-131 during May and June, 1978.

- C. Section 4.4.a and Table 3 of the Unit 1 ETS require in part, that milk samples be collected and analyzed from 4 indicator and 1 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 3 indicator and 1 background station at semi-monthly intervals during the grazing season and monthly intervals at all other times.

Contrary to these requirements, milk samples were not collected and analyzed at the required frequencies and locations for the intervals including:

TM-M-4B1	March, April and during the week of May 17, 1978
TM-M-5B1	March, April, and during the week of May 17, 1978
TM-M-14C1	February, and during the week of June 7, 1978
TM-M-2G1	During the week of June 7, 1978
TM-MG-1B1	During the week of May 17, 1978

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

- D. Section 4.4.a 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 frequencies from January 19 through April 13, 1978. This resulted in fewer than the required number of samples being collected and analyzed during this time interval.

- E. Section 5.3 of the TMI Units 1 and 2 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. Independent review of environmental matters and auditing of station activities relating to these Environmental Technical Specifications will be conducted by the Radiation Safety and Environmental Engineering Section, reporting to the Manager-Generation Engineering. Their review will be audited by or under the direction 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.

- F. Section 5.5 of the Unit 1 and Unit 2 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.

- (1) Section 2.2 of the Unit 1 ETS requires, in part, that a determination of the pH of the contents of each tank of neutralized regenerant wastes be made prior to release, using installed instrumentation; that all necessary adjustments to meet the specification be made prior to the initiation of the release; and that if the installed instrumentation is out of service, the necessary analyses be performed using laboratory instrumentation prior to initiating the discharge. An analysis for pH is required to be performed on a sample taken from the plant river water discharge during the release of each tank of regenerant wastes, or at weekly intervals as a minimum frequency.

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

- (2) Section 2.1.6 of the Unit 1 ETS requires, in part, that if the Unit 1 control room  $\Delta T$  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 1 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 1 Control Room plant  $\Delta T$  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  $\Delta T$  recorder is out of service were not prepared and followed as required.

- (3) Section 3.1.1.a of the Unit 2 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 the 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.

- G. Section 5.5 of the ETS for TMI Units 1 and 2 requires 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."

- (1) The Units 1 and 2 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. 0, were not completed and distributed as required by Appendix A of the procedure from April 1979 to the dates of inspection.

- (2) Unit 2 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 2 neutralizing tank discharge on several occasions, including on October 5, 1978, March 1, 2, 3, 4, 5, 6, 7, 8 and 10, 1979.

- (3) Unit 1 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.

- (4) Unit 2 Procedure No. 2104-3.8, Rev. 6 assigns to Unit 1 the responsibility to assure compliance with plant  $\Delta T$  requirements, including calibrations of the plant intake/ discharge temperature monitoring system.

Contrary to these requirements, Unit 2 Procedure 2104-3.8, Rev. 6 was not fully implemented in that the plant temperature monitoring system was not calibrated during 1978 and 1979.

- H. Section 3.1.2.a(1)(c) of the Unit 2 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 2 and continue for a period of at least three (3) years.

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

- I. Section 5.7.1 of the Unit 1 ETS requires in part, that records demonstrating compliance with the Limiting Conditions for Operation in Section 2 of the ETS, including plant  $\Delta T$  records, be retained for the life of the plant.

Contrary to this requirement, records of  $\Delta T$  measurements were not retained for February 19, 1979.

Section 5.8.6 of the Unit 2 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  $\Delta T$ , influent and effluent temperatures, monitoring required by the Unit 2 ETS, were not retained for March 20, 21, 22, 23 and 24, 1979, during which time the Unit 2 control room recorder was off-scale.

- J. Section 3.1.1 of the ETS, Unit 2, 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 Section 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 11:45 a.m. and 12:40 p.m., the station  $\Delta T$  exceeded 12<sup>o</sup>F, the specified thermal discharge  $\Delta T$  limit, and this occurrence was not reported to the NRC.

- K. Section 2.1 of the TMI Unit 1, 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<sup>0</sup>F above inlet temperature.

Contrary to these requirements on December 4, 1978 the plant discharge temperature was greater than 12<sup>0</sup>F above the plant inlet temperature.