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May 29, 1981
LL2-81-0151

Office of Inspection and Enforcement
Attn: Mr. Boyce H. Grier, Director
Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 17057

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operation License No. DPR-73
Docket No. 50-320
Inspection Report 50-320/81-01

This letter represents our response to the subject inspection report. In that report we were cited for the following apparent violation, which reads in part:

"....on March 6, 1981, the intent of Station Operating Procedure 2104-4.39, Revision 1, August 22, 1980, Solid Radwaste Disposal System Compacting Radioactive Waste, was altered by the implementation of TCN No. 2-81-48, dated March 6, 1981, without prior PORC review and the Unit Superintendent's (Director, Site Operations, TMI-2) approval. This TCN deleted a radiation level limit for trash compacting".

Item #6 of Appendix A of the inspection report states, in part:

"From the review of this task, the inspector determined that Administrative Controls were improperly implemented in that the intent of Procedure 2104-4.39 was changed by removal of the radiation restriction from the procedure, and therefore the TCN required PORC review before implementation."

It is our contention that the intent of the procedure was not changed. Step 2.6 of procedure 2104-4.39, Revision 1, states:

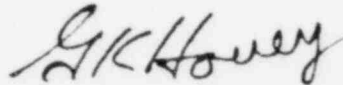
"Monitor each bag of waste material prior to compacting; any bag found reading greater than 500 Mrem on contact must be set aside for other means of disposal. Notify the HP Department of any bag reading greater than 500 Mrem."

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At the time TCN 2-81-48 was issued, a quantity of higher activity waste (>500 Mrem on contact) was temporarily stored in the Spent Fuel Pool Cooler Room in the Unit #2 Auxiliary Building. This waste resulted primarily as a result of cleanup of the Unit #1 sample sink area and was being stored until sufficient quantities could be collected to justify compaction and shipment as type B LSA waste. However, it was later decided that the "other means of disposal" would be to mix the higher activity waste with lower activity waste to permit compaction and shipment of all the waste as type A LSA waste.

In the final analysis, our contention is that the intent of the procedure was not changed; in every respect the intent of the procedure was followed. Therefore, we do not agree with this apparent violation.

Sincerely,



G. K. Hovey
Vice President and
Director, TMI-2

GKH:BHG:be

cc: L. H. Barrett, Deputy Program Director
Dr. B. J. Snyder, Program Director - TMI Program Office