



Metropolitan Edison Company
Post Office Box 480
Middletown, Pennsylvania 17057

Writer's Direct Dial Number

December 24, 1981
L1L 363

Office of Inspection and Enforcement
Attn: R. R. Keimig
Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Response to Notice of Violation
Inspection 50-289/81-22

Your letter of November 12, 1981 transmitted a Notice of Violation based upon the Office of Inspection and Enforcement special safety inspection between August 17 and September 2, 1981. This letter and its attachments constitute our response to Appendix A of the subject Inspection.

Attachment 1 contains the details of our response to findings we believe are valid. These details include: (a) the corrective steps which have been taken and the results achieved; (b) corrective steps which will be taken to avoid further violations; and (c) the date when full compliance will be achieved. Attachments 2 and 3 contain our response to an item that we believe is not a valid finding.

This response is true and correct to the best of my knowledge, information and belief.

Sincerely,

G. Toole for
H. D. Hukill
Director, TMI-1

HDH:CJS:vjf
Attachments

Signed and subscribed to before me this 24th day of December 1981.

Pamela Joy Lubrecht
Notary Public

PAMELA JOY LUBRECHT, Notary Public
Middletown, Dauphin County, Pa.
My Commission Expires August 29, 1983

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n Company is a Member of the General Public Utilities System

ATTACHMENT 1

Response to Valid Items

Item A

10 CFR 50, Appendix B, Criterion VI, Document Control, requires that the issuance of documents, drawing and procedures be controlled so as to assure adequate review, authorized approval and release, and distribution and use at the work location. Three Mile Island Nuclear Operational Quality Assurance Plan (OQAP), Revision 9, also requires that these measures be established to control such activities. The OQAP paragraphs 3.2.2.5 and 3.2.2.6 state the following: "5. Document distribution must be sufficient to assure that the documents are readily available at convenient locations to responsible personnel prior to commencement of work. 6. Document transmittal and maintenance measures shall be incorporated in document control systems to prevent inadvertent use of voided, superseded or obsolete documents."

Contrary to the above:

Sub Item A.1.

On August 25, 1981, one of six contractor erection drawings and three of seventeen contractor assembly drawings in use at the work location for the erection of an environmental barrier between Unit 1 and Unit 2 were not of the latest approved revision.

Response to Sub Item A.1.

(a) Corrective Action Taken and Results Achieved

A review was performed to determine if revisions to these four drawings affected the field work in progress. This review concluded that the drawing revisions had had no effect upon the field and erection work and that the field and erection work was in accordance with the current revision of these drawings.

(b) Corrective Actions to Avoid Further Violations

The issued vendor drawing list showed that the above four (4) drawings with later revisions were not on the contractors field drawing stick. It was discovered that the contractors field supervisor had received the drawings and reviewed their content but had not replaced the revised drawings with the latter revisions on his field stick; instead these drawings were left in the field shop area.

The four drawings were placed on the contractors drawing stick at the end of the working day. The content of the drawing changes and their effect on the field installation, as noted above, was not compromised in this instance.

A detailed drawing control status review was performed of the vendor and vendor practices in question. This review identified one typographical error on a drawing revision and three instances of later drawing revisions being noted on drawing lists prior to their approval and availability for distribution. Although no technical problems resulted from any of the noted discrepancies, we have emphasized the need for good drawing control practices to our personnel and contractor personnel involved in these instances.

A situation of superceded drawings being on the plant modification job site will result from those few instances in which detailed information has been entered by field personnel on the superceded drawing, such information not being readily transferable to the new drawing. This information may be, for example, detailed as installed circuitry or special color coding. It is currently required that superceded controlled documents be immediately removed from the job site except in those few instances that they must be temporarily held for job performance. In those instances, the drawing must be appropriately marked and annotated to indicate that they have been superceded and that the new drawing is immediately available. A review is also done to verify that the revision made to the official drawing has not effected the area of concern. This mechanism of controlling superceded drawings constitutes long term corrective action being implemented that appropriately allow for special circumstances.

(c) Date When Full Compliance Will Be Achieved

All corrective actions identified above have been implemented.

Sub Item A.2

On August 19 through 28, 1981, numerous controlled drawings located in the Control Room and other controlled drawing locations did not reflect the latest system information as a result of system modifications.

Response to Sub Item A.2

Prior to the reorganization brought about after the TMI-2 accident, Met Ed and GPU had two distinct procedures for making change modifications to Unit 1 Systems. The above concern is related to changes made under the Met Ed Procedure (AP-1021) and its deficiency to ensure timely revision of controlled drawings to reflect modifications.

(a) Corrective Action Taken and Results Achieved

1. On July 1, 1981, EMP-008 "Release of Technical Documents" became an approved GPUN Procedure. Also, at approximately the same time, GPU began issuing, periodically, the Integrated Drawing List and the Vendor Drawing List. Collectively these documents provide positive identification of a particular document's status. Met Ed procedure AP-1021 has been used since July 1981, for minor modifications on a case by case basis as approved by the Plant Engineering Director.
2. The ongoing (commencing in February, 1980) program to identify and document the as constructed condition for approximately 2500 drawings (listed on 315 Design Change Notices per AP 1021) is providing improved configuration status for the as built condition of baseline (functional) Drawings.

(b) Corrective Actions to Avoid Further Violations

Steps are being taken to revise or replace AP-1021. Procedures in effect or drafted and under review for approval include GPUN Procedures EP002, EMP015, EMP019, EP020, and EP025. These authorize drawing preparation, control changes, and permit identification of Plant Engineering scope-of-changes, and specification of construction specifications. These procedures and their attachments capture the as constructed conditions and ensure the preparation/revision of As Built Drawings.

When fully implemented these procedures will, with our ongoing program of updating drawings previously issued under Met-Ed procedure AP-1021, ensure that the latest system information is reflected on our controlled drawings.

(c) Date When Full Compliance Will Be Achieved

Several procedures needed to fully implement the Drawing Control Program are presently in effect. Others required are in the review/approval circuit. All required procedures will be approved and issued prior to 3/1/82.

Sub Item A.3

On August 19, 1981, a Control Room operator verified the accuracy of a proposed system tagout using Drawing C-302-203, which was annotated as having Design Change Notices (DCN's) 0057, 0100, and 0112 applicable to it. These DCN's were not available nor were they used by the operator.

Response to Sub Item A.3

(a) Corrective Action Taken And Results Achieved

The referenced drawing is one of many baseline drawings located in the Control Room affected by DCNs. With the exception of those affected by 66 of the 315 DCNs identified in A2a2 above, all baseline drawings presently show as built conditions or a reference has been made on the drawing to an attached interim drawing.

(b) Corrective Action To Avoid Further Violations

Compliance with EMP-008 will insure against further violations.

(c) Date When Full Compliance Will Be Achieved

Full compliance was achieved as of 12/1/81, with the exception of completing the program identified in A.2.a.2. above.

Sub Item A.4

On August 24 and 25, 1981, uncontrolled drawings marked "for information only" for the integrated control system (ICS) and non-nuclear instruments (NNI) were being used by instrument and control (I&C) technicians at work locations in the control building.

Response to Sub Item A.4

(a) Correction Action Taken and Results Achieved

The site ED & CC (Information Management Group) delivered controlled copies of the legible ICS & NNI drawings. Previous GPUN examinations had indicated there was a need to prepare nineteen (19) drawing records to reflect the composite changes to the NNI. This has been done. The drawings have been approved (12/1/81) and the architect/engineer (A/E) has been directed to incorporate the as-built condition into the drawing records. Subsequently, a decision was made to redraw 85 of the NNI & ICS drawings due to "illegability". The A/E has committed to provide these drawings by February, 1982. For the ICS, the as-built condition were previously being documented as the final step in closing out change modification 650, which is now complete.

Plant I&C technicians will begin using these drawings as they become available and have verified that these reflect as-built status of the plant.

(b) Corrective Action to Audit Further Violations

GPUN Technical Functions Procedures provide for controls over engineering, approval, and release of plant modifications. Routine recording of the as-built drawing revisions is provided by previously discussed GPUN Technical Functions Procedure EMP-008. In addition, site document control procedure AP 1001 has been revised to further ensure that this problem will not recur.

(c) Date When Full Compliance Will Be Achieved

The redrawn NNI and corrected ICS drawings, as well as controlled copies of the remaining drawings of concern will be provided to the plant for use prior to criticality.

Sub Item A.5

On August 19 through September 2, 1981, four system drawings annotated as control copies, and three sketches from a procedure were posted, and a drawings notebook was maintained at the Radwaste Panel work location in the Auxiliary Building. None were in the controlled system and two of the posted drawings were not of the current revision.

Response to Sub Item A.5

(a) Corrective Action Taken and Results Achieved

The subject drawings will be removed or replaced with current revisions.

(b) Corrective Action To Avoid Further Violations

A memorandum will be issued to Operations and Maintenance Department personnel forbidding the use and posting of uncontrolled drawings/procedures. These requirement will be formalized in a procedure presently being written. Administrative procedure 1001C "Drawing Distribution Control" has been developed and establishes locations for controlled drawings. This procedure provides for the maintenance of a computer list that will aid in the distribution and control of drawings.

(c) Date When Full Compliance Will Be Achieved

Full compliance will be achieved by 1/31/82.

Sub Item A.6

On August 19 through 28, 1981, a laminated chart was posted on the side of Control Room Panel PLF that contained a summary of set points and action plans; an engraved placard was permanently mounted to Control Room Panel PLF that summarized the thermal discharge limits required by Technical Specification Appendix B; and, four engraved placards were permanently mounted on the Makeup Pumps breaker panels located in the Control Building that summarized Makeup Pump breaker precautions required by Technical Specification Appendix A, part 3.1.12.3. None of these placards/charts were controlled by administrative procedures to assure that they would be updated should changes be made to the procedures or Technical Specifications on which they were based.

Response to Sub Item A.6

(a) Corrective Action Taken and Results Achieved

The uncontrolled laminated chart of emergency action level thresholds and thermal discharge limits located on control room panel PLF will be removed. A program has begun to identify switchgear placards that contain instructions or precautions to the operator that will result in all placards being placed on controlled drawings. As part of any procedure Tech Spec or plant modifications the drawings and associated placards will be revised as appropriate.

(b) Corrective Action to Avoid Further Violations

The above program both verifies the need for and the correctness of placards now in place and will prevent unwanted or incorrect placards from being posted in the future.

(c) Date When Full Compliance Will Be Achieved

The laminated charts on panel PLF were removed by 12/20/81. The program described above will be completed by 3/1/82, or criticality which ever is later.

Sub Item A.7

On August 19 through 28, 1981, thirteen errors were detected in the posting and distribution of drawings and aperture cards which included out-of-date drawings at a controlled drawing location, failure to post controlled drawings with the latest applicable design change notice; and, annotating drawings with the incorrect design change notice.

Response to Sub Item A.7

(a) Corrective Action Taken and Results Achieved

All errors relative to the distribution of drawings by the Drawing Distribution Control Section of the Information Management Department were corrected during the course of the inspection. In addition, a complete inventory of drawings in the Unit 1 Control Room was conducted on August 26, 1981.

(b) Corrective Action to Avoid Further Violations

The Drawing Distribution Control Section has been instructed to recheck its entries in the control log to ensure accuracy, and then to recheck its field work (deliveries, stamping, etc.) against the control log. In addition, drawings at each authorized Distribution Point will be periodically inventoried against drawing lists and the control log to ensure that drawings are up-to-date, and properly stamped to indicate outstanding changes DCN's, etc.). These inventories will also serve to monitor the performance of the Drawing Distribution Control Section.

(c) Date When Full Compliance Will Be Achieved

Corrective steps outlined in Item B above were fully implemented on October 15, 1981.

Sub Item A.8

See Attachments 3 and 4.

Item B.1

Technical Specifications 6.8.1 and 6.8.2 requires that written procedures and administrative policies shall be established, implemented and maintained... and that each procedure and administrative policy and changes thereto, be reviewed by the Plant Operations Review Committee and approved by the Unit Superintendent prior to implementation.

Contrary to the above, on August 20, 1981, Procedure AP1001C, "Drawing Distribution and Control", which was being implemented as the procedure for control of drawing and aperture cards, had not been reviewed by the Plant Operations Review Committee and had not been approved by the Unit Superintendent.

Response to Item B.1

(A) Corrective Action Taken And Results Achieved

Procedure AP-1001C "Drawing Distribution and Control" has been PORC reviewed and approved by the Unit 1 Operations & Maintenance Director.

(B) Corrective Action To Avoid Further Violations

No further corrective action is planned. The reasons for the delay in the approval of this procedure are very complex. This was an isolated case and no generic action is considered appropriate.

(C) Date When Full Compliance Will Be Achieved

Full compliance was achieved by 12/20/81.

ATTACHMENT 2

Response to Invalid NRC Finding A-8

Response to Sub Item A-8

We disagree with the NRC Notice of Violation that the transition from the "old" engineering procedures manual to the new Technical Functions procedures manual resulted in an unacceptable control situation regarding responsible user personnel. The manuals are primarily intended for use by personnel in the Technical Functions Division. All Technical Functions Supervisors were issued controlled copies of the new manual from the date of first issue. Other users, particularly at the plant site, use the procedures as interfacing instructions with appropriate plant procedures. For the transition period, the usage of the "old" procedures alongside the "new" procedures was specifically permitted. Both the "old" and "new" procedures prescribed methods which are consistent with the QA Plan and in most cases are very comparable. Therefore, we believe the situation was not one of personnel using "voided, superseded, or obsolete documents" but rather permitting the use of approved alternative methods during the transition period.

The following actions were taken to ensure that people in GPUN are aware of the current status of engineering procedures. These, we believe, have provided acceptable control of the engineering procedures for our responsible user personnel.

1. Attachment 4, pages 1 and 2 contains memorandum which formally issued the Technical Functions Procedure Manual - a new document. The first section of the document PO-001 is entitled "Applicability." This section clearly states the status of old vs. new procedures.
2. Attachment 4, pages 3 and 4, contains memorandum recalling the 'old' engineering procedure manuals. One or the other of these memos was sent to everyone holding a controlled copy of the procedure manual.

A few people, all in QA, are authorized to retain "old" engineering procedures manuals for audit purposes. However, it is required that these manuals be clearly marked to indicate that they are for "information Only."

3. Orientation sessions have been conducted for Technical Functions Supervisors designed to acquaint them with the scope and use of the "new" procedures. Similar sessions have been held for TMI-1, TMI-2, and Oyster Creek plant staffs.
4. Each new employee in Technical Functions is scheduled for a one-day orientation that includes a discussion of the Technical Functions procedures, their use, etc.

Inter-Office Memorandum

Date JUNE 1, 1981

Subject TECHNICAL FUNCTIONS PROCEDURES

To DISTRIBUTION PER TAP-003



Location CHERRY HILL BUILDING

Attached is a Technical Functions Procedures Manual which will be effective as of July 1, 1981.

If you have any questions or comments regarding the procedures, please do not hesitate to call me on extension 2137.

Procedures stamped "DRAFT" will be replaced with signed-off procedures as they become available. Cover inserts, spines and tabs (EPs and LPs) shall be issued under separate cover.

A handwritten signature in black ink, appearing to read "John C. Flynn". Below the signature is a horizontal line with the typed name "J.C. FLYNN" centered underneath it.

JCF/z

Attachments

Please return this memo acknowledging that you have received the attached Procedure Manual, Control Copy No. _____.

DATED

NAME

GPU Nuclear	TECHNICAL FUNCTIONS DIVISION	REV. NO. 0	PROCEDURE NO.: PO-001
TITLE Applicability		DATE OF REV. 6/1/81	PAGE 1 OF 1

Technical Functions' personnel must comply with the procedures contained in this manual.

"A limited number of other procedures are still in effect for Technical Functions' personnel; namely,

GPU Service Corporation Procedures
EP-019, EP-022, and EP-025

JCP&L Procedures
2009 and 2019

In addition to the above, some procedures in this manual authorize the use of other procedures. Except as noted above, procedures that have been requirements under past organizational structures are no longer valid for Technical Functions' personnel.

Station Technical Specification requirements must be met. Anyone experiencing difficulty in implementing any of the procedures in this manual should contact the Engineering Procedures and Standards Manager.

Inter-Office Memorandum

Date August 28, 1981
ESD/261

Subject Recall of GPUSC Engineering
Procedures Manuals

To DISTRIBUTION

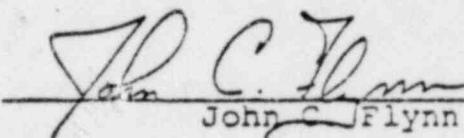
GPU Nuclear

Location CH Bldg.

Our records show that you have a controlled copy of the subject manual. The copy number is listed next to your name in the attached distribution list. Proper document control requires that all copies be accounted for properly. Please return your copy of the manual, intact, to me at the Cherry Hill Building in Parsippany on or before September 15, 1981.

The Technical Functions procedure manual issued to you in June, 1981 replaces the GPUSC Engineering procedure manual. The GPUSC Engineering Standards manual remains in effect and is to be used in conjunction with the Technical Functions procedure manual.

If you have any question regarding this memo or Technical Functions procedures in general, please call me at Extension 2136 in Parsippany.


John C. Flynn

JCF/c

Attachment

Inter-Office Memorandum**GRU Nuclear**Date August 28, 1981
ESD/262Subject Recall of GPUSC Engineering
Procedures & Standards Manuals

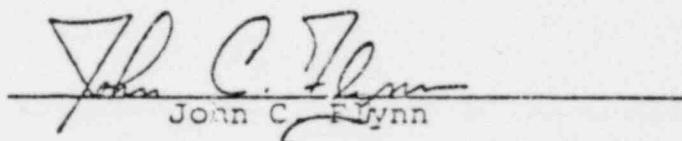
To DISTRIBUTION

Location CH Bldg.

Our records show that you have controlled copies of the GPUSC Engineering Procedures and Engineering Standards Manuals. The copy numbers are listed next to your name on the attached distribution list. Positive control measures for these manuals require that they be accounted for properly. Please return both manuals, intact, to me at the Cherry Hill Building in Parsippany before September 15, 1981.

The Technical Functions Procedures issued in June, 1981 and several subsequent amendments replaced the GPUSC Engineering Procedures Manual. The Standards Manual is still in effect. Recent organizational changes necessitated that we adopt a new distribution list. Although the ceiling number of manuals for issue precluded all previous manual holders from being included on this new list, every attempt has been made to provide an ample supply. Both manuals should be available in your section.

If you have any questions regarding this memo please call me at Extension 2136.


John C. Flynn

JCF/c

Attachment

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