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September 20, 1984
5211-84-2228

Dr. T. E. Murley
Region I, Regional Administrator
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
Inspection Report 84-10 (GPUN Comment)

GPUN has reviewed Inspection Report 84-10 which examined the Reactor Building Integrated Leak Rate Tests (ILRT) performed at TMI-1 during the period from April 15, 1984 to April 19, 1984. The test report entitled "Reactor Containment Building Integrated Leak Rate Test" was submitted in accordance with 10 CFR 50 Appendix J on July 19, 1984. We have taken action to resolve the four findings identified in Inspection Report 84-10 as inspector followup items; but aside from those findings, we wish to bring to your attention the fact that we do not agree with some of the statements made in that report.

GPUN takes exception to the comment in Section 4.2.e that there was no objective evidence that QA/QC surveillance field inspection had been conducted. As a result of the inspector comment during the test that he had not seen anyone from QA/QC, a QA monitor introduced himself to the inspector. The inspector then acknowledged that he had seen that monitor around.

GPUN QA/QC personnel do not wear insignia as recommended by the inspector during the inspection. GPUN feels that to do so might serve to undercut the validity of the audit/inspection process. The observation of activities by an inspector should be representative of activities conducted with or without the presence of a QA/QC inspector. GPUN does not attempt to conceal the presence of its quality assurance personnel, but we do not feel that calling attention to their presence would serve a useful function. Therefore, GPUN does not agree that there should be objective evidence through the use of labels or

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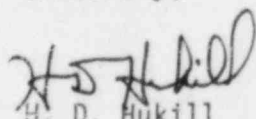
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other insignia worn by QA/QC personnel while performing surveillance field inspections. Prior to the inspection exit interview, documenting evidence of QA involvement in the test was presented to the NRC inspector. In all there are over 25 individual QA monitoring reports and three separate shift monitoring assessments which document QA involvement in the preparations for and/or the actual conduct of this test. Documentation of the QA/QC field surveillance inspection activities during the ILRT is available at TMI-1 for review by NRC. GPUN feels that such documentation provides relevant evidence of adequate QA/QC field surveillance inspection coverage during the April, 1984 ILRT and other activities inspected by GPUN Quality Assurance personnel.

A second disagreement with the inspection report involves a statement concerning IC-V3: "the valve was exempted during the Type A test pending further maintenance on the valve and successful completion of a local leak rate test and inclusion of these test results in the Type A test results." IC-V3 was in no way exempted during the Type A test. It was closed by its normal method along with the valve in series and the piping on the out board side was vented. IC-V3 therefore received no special treatment during the ILRT. IC-V3 was repaired subsequent to the ILRT but correction of the ILRT results would be unnecessary since such a correction would make the calculated Type A test leakage results even lower than the satisfactory test results which were included with our submittal of July 19, 1984.

GPUN would also like to point out that we feel the April, 1984 ILRT was an extremely well done test. The NRC inspector commented verbally at the Exit Interview on April 19, 1984 that this test was one of the best tests of its kind that he had witnessed. Inspection Report 84-10 states that the inspector has determined that the ILRT appeared to be satisfactory pending final review of the Licensee's report. Throughout the report, no credit is given to the quality of the test nor are the results represented here to be more than borderline satisfactory. Judging from the inspector's comments as well as our own observations, we would have expected the report to have been balanced by more favorable comments which were not included.

Sincerely,


H. D. Hukill
Director, TMI-1

HDH:MRK:vjf

cc: R. Conte, NRC Resident Inspector
T. Martin, NRC Region I
J. Chung, NRC Region I