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5/10/73

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METROPOLITAN EDISON COMPANY, DOCKET NO. 50-289

CURRENT ENFORCEMENT CASE

There was a followup meeting with Metropolitan Edison, GPU, United Engineers, and Gilbert Associates representatives in the Region I office at 1:30 p.m. on May 7, 1973. The purpose of the meeting was to discuss in more detail, the findings and position of Region I on the current enforcement case. Attendees at the meeting included the president of GPU, Mr. Coombs, the president of Metropolitan Edison, Mr. Miller, several vice presidents of Metropolitan Edison, United Engineers & Constructors project manager, the project manager from Gilbert Associates. Region I representatives were Mr. Howard and Mr. O'Reilly.

The meeting was similar to the meeting conducted last week (5/1/73). This meeting was in effect, a mini-exit interview. No new items were brought to our attention. Mr. Coombs summarized their position at the end of the meeting. His position was, in effect, that:

He did not believe that the fine was necessary in that he assured me that we had gotten the attention of management, that decisive actions were being taken, and that the imposition of the civil penalty would not be in their or our best interests in regard to his project. He made it perfectly clear also that GPU's Board of Directors was aware of the situation and that they were very concerned about the progress of construction and our findings. He reiterated his request that if we intended to impose the civil penalty, he would like to meet with HQ personnel and myself before they receive ^{the data} and formal documentation.

Jim

Dictated by JPO'R
cc: Morris Howard, RO:I

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December 14, 1972

Mr. James P. O'Reilly
Director, Region I
Directorate of Regulatory Operations
United States Atomic Energy Commission
970 Broad Street
Newark, New Jersey 07102

SUBJECT: THREE MILE ISLAND NUCLEAR STATION UNITS 1 AND 2
DOCKET NOS. 50-289 AND 50-320
QUALITY ASSURANCE PROGRAM

Dear Mr. O'Reilly:

Our letter dated November 3, 1972, described the actions we are taking to resolve each finding reported in AEC/DRO letter of October 6, 1972, which contained findings based on an AEC/DRO audit of the Three Mile Island construction site. In our meeting of November 9, 1972 in your office in Newark, we agreed that we would supplement our November 3, 1972 letter to describe the general corrective measures we have taken with regard to compliance with QA/QC requirements at the Three Mile Island site.

These general corrective measures can be summarized as follows:

1. Indoctrination and training programs were instituted in September 1972 for all UE&C site quality control personnel and for appropriate UE&C construction supervision. These training programs are directed towards assuring that UE&C personnel performing work on nuclear parts of the plant fully understand the requirements of construction and quality control procedures. New UE&C personnel will be given equivalent training and indoctrination. This requirement for training and indoctrination of personnel will be incorporated in appropriate construction and quality control procedures by January 15, 1973.
2. UE&C has assigned a senior individual to a position where his main responsibilities are to (a) ensure that UE&C construction supervision understands and implements quality control requirements, and (b) ensure that UE&C construction rapidly and satisfactorily resolves deficiency reports, audit findings, and similar reports of non-conformances. This individual has authority equivalent to the site superintendent reporting directly to the UE&C project manager, and is the UE&C representative on the Deficiency Review Board.

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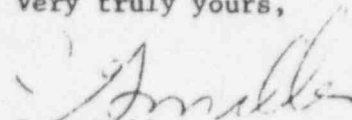
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3. The UE&C site procedures for control of nonconforming conditions (QC-17 and QC-17-2) were revised in August 1972 to emphasize that any nonconforming work must be stopped without delay.
4. Effective October 31, 1972, GPUSC has taken over management direction of the UE&C site QC organization. The head of the former UE&C QC group for the Three Mile Island project is now the GPUSC TMI QA Manager and reports directly to the GPUSC Manager of Quality Assurance. It is considered that GPUSC management of the QC organization will assure that UE&C QA and construction personnel understand and comply with GPUSC's requirements for strict compliance with all QA/QC requirements in procedures, specifications, SAR's, etc.. Since taking over management of the UE&C site QC organization, it has been emphasized again to site QC personnel that no deviations are permitted from QA/QC requirements, and any nonconformances which are detected must be controlled in accordance with the applicable QC procedures (QC-17 and QC-17-2).
5. In August 1972, GPUSC established a special surveillance group of about ten engineers to monitor UE&C construction activities at the site and assure compliance with QA/QC requirements. A further function of this group was to help make sure that the UE&C site QC personnel whose activities they monitored had a satisfactory understanding of all applicable requirements. We consider this special group to have served its purpose, and that site performance has improved. With GPUSC taking over management direction, we have retained at the site several of the engineers from the group as QC engineers reporting to the GPUSC Three Mile Island QA Manager. These engineers, and other new engineers we are assigning, will aid in the review of documentation, preparation of procedures, resolution of problems, etc..
6. In conjunction with GPUSC taking over management direction, the duties of the GPUSC site QA group have been redefined to emphasize their auditing function. The GPUSC site QA representative's title has been changed to GPUSC Site QA Auditor. Most of his former administrative duties, for example, review of construction procedures, have been transferred to the GPUSC TMI QA Manager. It is considered that this realignment of responsibilities will permit the GPUSC Site QA Auditor to perform more frequent and effective audits. The GPUSC Site QA Auditor will make use of consultants as necessary to assure that important aspects of site operations are audited.
7. The President of UE&C established an Executive Task Force on September 5, 1972, with the objective of independently investigating all facets of the project, including the quality control effort, and making recommendations where appropriate back to the President.
8. In order to achieve a more favorable supervision to craft ratio, the manual craft labor force is being reduced by 20% in the months of November and December 1972. This will tend to exert more effective supervision and control over the work.

Our letter of November 3, 1972, also indicated that we would advise you of the final resolution of two items regarding Grinnell pipe welds. One item, which was discussed in paragraph 3.b of enclosure (1) to our letter, involved low ferrite content in some stainless steel welds. The second item, which was discussed in paragraph 19 of enclosure (2) to our letter, involved excessive weld weaves. Grinnell has informed our representatives that they consider both of these conditions to be acceptable. Our technical evaluation is continuing and is not yet complete. We expect to have it complete by January 31, 1973, and will advise you of our conclusions at that time.

Very truly yours,


J.G. Miller
Vice President

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