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MEMORANDUM FOR: Richard W. Starostecki, Director
 Division of Project and Resident Programs
 NRC Region I

FROM: Karl V. Seyfrit, Chief
 Reactor Operations Analysis Branch
 Office for Analysis and Evaluation
 of Operational Data

SUBJECT: EVALUATION OF LERS FOR THREE MILE ISLAND NUCLEAR STATION,
 UNIT 1, FOR THE PERIOD FROM OCTOBER 1, 1982 TO SEPTEMBER 30,
 1983 - AEOD INPUT TO SALP REVIEW

In support of the ongoing SALP reviews, AEOD has reviewed the LERs for Three Mile Island Unit 1. AEOD's review focused on the clarity and adequacy of the descriptions provided in the individual LERs. The review included LERs for TMI-1 that were written for events which occurred between October 1, 1982 and September 30, 1983. The licensee submitted about 28 LERs during the report period. In general, the LERs were acceptable and reasonably detailed to permit an understanding of the events.

The enclosure provides observations from our review of the LERs. If you have any questions regarding this matter, please contact myself or Medhat El-Zeftawy at FTS 492-4434.

Karl V. Seyfrit, Chief
 Reactor Operations Analysis Branch
 Office for Analysis and Evaluation
 of Operational Data

Enclosure:
 As Stated

cc w/enclosure:
 J. Van Vliet, NRR

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| DATE ▶ | 11/2/83 | 11/7/83 | 11/7/83 | | | | |

SALP REVIEW FOR THREE MILE ISLAND 1

The review and comments on LERs covered the following subject matter:

1. The information in the narrative sections was generally sufficient to provide the reader with a good understanding of the event.
2. There are no significant problems with the coded information provided by the licensee.
3. Twenty-eight LERs were retrieved from our data base with event dates from October 1, 1982 to September 30, 1983. The descriptions of events were clear and adequate. The root cause of the occurrences was well explained and documented including the circumstances which led to the occurrences. Immediate and long-term corrective actions were also mentioned. The largest percentage (40%) of LERs submitted were attributed to component failures. "Personnel errors" accounted for 7% of the events. Seven percent of the events were caused by procedural deficiencies and 14% were attributed to fire penetration seal degradation. Thirty-two percent were attributed to "others" category.
4. In all instances when the licensee promised to submit an update report it did.
5. In many cases the licensee referenced LERs pertaining to previous events of a similar nature. For example, in LER 83-012, other LERs (80-14, 78-12, 78-11, and 77-8) were referenced. In addition, the licensee stated when there had been no similar previous occurrences.
6. The licensee, in general, has not reported the component failures to the Nuclear Plant Reliability Data System (NPRDS). Only in LERs 83-001, 83-003, 83-011, 83-016, and 83-023 are there indications that the licensee has reported the failures to NPRDS.
7. Regarding multiple event reporting in a single LER, the events generally were combined correctly in accordance with the guidelines of NUREG-0161 (general instruction #7).
8. Six preliminary notifications (PNs) were issued in the SALP assessment period (PNO-TMI-82-020, 82-067, 83-040, 83-004, 83-007, and 83-093). None of these PNs were further documented by LERs. Our review determined that PNs (PNO-TMI-83-004, 83-007, and 83-093) constitute notices to relatively significant events and probably should have been documented by LERs.