

# Jersey Central Power & Light Company



MADISON AVENUE AT PUNCH BOWL ROAD • MORRISTOWN, N. J. 07960 • 201-539-6111

MEMBER OF THE

General



Public Utilities Corporation

October 30, 1973

Mr. James P. O'Reilly, Director  
Directorate of Regulatory Operations, Region I  
United States Atomic Energy Commission  
631 Park Avenue  
King of Prussia, Pennsylvania 19406

Dear Mr. O'Reilly:

This letter is in reply to your letter of October 4, 1973 to Mr. Ivan R. Finfrock regarding the inspection conducted by Mr. Greenman on August 28 and 29, 1973.

In response to the violations noted in your enclosure, we wish to advise you of the following:

Item 1: Core Spray Motor Operated Valve Surveillance Test - not completed during period of April 26 to June 21, 1973.

Response: Since implementation of the surveillance test program prior to commercial operation of the station, there have been few recognized violations of the required testing, or in the required testing frequency that is to be accomplished, as outlined in the Technical Specifications. However, any violations which may occur are considered to be serious, notwithstanding the fact that the percentage rate of completion may, for all intents and purposes, be 100% considering that nearly 30,000 tests, checks, calibrations, and the like are conducted in a six-month time period. The required operability testing, which includes not only this test in question, but also others at varying frequencies, has been reduced to a simplified schedule, conducted by licensed operators under the direction of licensed senior operators and subsequently reviewed by engineering and supervisory personnel on the plant staff.

In reviewing the testing records with the inspector, it was recognized that a complete, thorough audit of the surveillance test program was in order to assure plant management personnel that no other deficiencies of this type had occurred. As per the recommendation contained in paragraph "F" under Management Interview, a complete audit of the testing records is in progress.

This program should be completed by November 15, following which the Directorate of Regulatory Operations will be notified if any additional deficiencies have been uncovered.

Item 2: Radwaste Outside Tank Activity - <10 curies from August 17 until September 4, 1973.

Response: While it is agreed that it would be preferable to explicitly state actions that will be taken to assure compliance with existing license requirements such that the 10 curie limit will not be exceeded in the future, it is virtually impossible to predict the consequences of equipment problems in the radioactive waste treatment facility and system discharging waste water thereto. Radioactive waste system operators, chemistry technicians, licensed operators and the plant staff are all well aware of the license limitations and attempt to take every precautionary step possible to insure that the requirements are met. This particular violation of the Technical Specifications has occurred in the past. Each event had its own peculiar set of circumstances; the only common link being that it was preceded by an equipment problem or malfunction either in the processing system in the facility or in systems discharging waste water to the radwaste facility.

As noted in the Abnormal Occurrence Report referenced in the RO Inspection Report, paragraph "C" under Unusual Occurrences, the high activity in the outside tanks was directly attributed to the particulate matter in suspension in the waste surge tank. Specific actions which have been taken recently to reduce the outside tank activity to <10 curies and to maintain it are as follows:

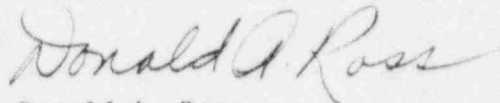
1. Decontamination of the surge tank is in progress. No additional water is being permitted in the tank until this effort has been completed.
2. As a result of "1" above, plant power level has been limited. This has resulted since regeneration of the condensate demineralizers has been required, and whereas in the past, some of this water would have been transferred to the surge tank to make room in the facility for additional regeneration, this action has not been taken.
3. A new tube bundle and demister element have been installed in the waste concentrator which have increased the through put capability of that unit. In addition, a chemical solution is being introduced into the feed to the unit which is intended to assist in preventing fouling of the tube bundle.
4. The services of an outside contractor have been obtained to permit more rapid reduction of the solid waste inventory in the waste treatment facility.

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5. The services of a waste water treatment consultant have been obtained to assist the plant staff in improving the water processing methods.
6. As a result of "4" above, a new pre-coat material is being applied to various filters in the facility to enhance their effectiveness.
7. Cleaning and flushing of accumulated debris from the waste neutralizing and floor drain collector tank has been accomplished.
8. A new mechanical maintenance foreman position has been established which, as a result, provides increased direction to maintenance efforts throughout the plant site. This has been particularly beneficial to operation of the waste treatment facility.

It is expected that the above efforts, in addition to continuing engineering solutions to equipment problems will go a long way in preventing the 10 curie license limitation from being exceeded in the future.

Very truly yours,



Donald A. Ross  
Manger, Nuclear Generating Stations

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