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METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

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September 15, 1978
GQL 1534

Director of Nuclear Reactor Regulations
Attn: R. W. Reid, Chief
Operating Reactors Branch No. 4
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Fire Protection

Met-Ed letter of July 28, 1978 (GQL 1294) stated that a study had been initiated to determine which alternative (i.e., replacement, establishing adequacy through tests, or certification by a registered independent fire protection engineer) will be pursued such that the fire rating of all unlabeled doors can be established, and corrective action, if any, can be accomplished.

Results of the study to date indicate, (1) door replacement would cost on the order of \$500,000.00 to accomplish (approximately 50 doors X \$10,000.00 per door), and would be a very long-term project; (2) testing a representative door requires verification that it is, in fact, representative of the doors being qualified; and (3) certification by a registered fire protection engineer would consist of a signed statement indicating that the doors "appear" to be rated fire doors.

The above alternatives were discussed with the NRC on several occasions during the week of September 4, 1978. Met-Ed requested NRC response to replacing only the doors, i.e., leaving the door frames imbedded in concrete. This would reduce the cost in the first alternative to approximately \$50,000.00, and significantly reduce the time required to complete the modification. The NRC stated that this would be unacceptable.

Met-Ed does not, at this time, propose to pursue testing of a representative door because of the subjectiveness in verifying that the door tested is, in fact, a representative door.

Based on NRC guidance, Met-Ed will perform a complete QA documentation search to, (1) identify the purchase orders for the installed doors, and the specification that the doors were ordered under; (2) compare the specification to the rated door specification; (3) identify the locations where the doors identified

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R. W. Reid, Chief

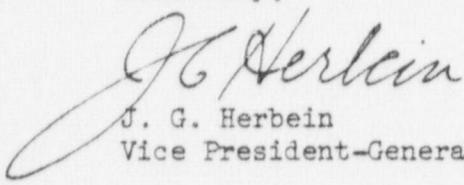
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were installed; (4) justify adequacy based on the fire loading on each side of the door. It is anticipated, that if successful in retrieving the above documentation, Met-Ed will have justification for stating that the doors are acceptable and replacement in all cases will not be necessary.

Met-Ed anticipates that the above QA documentation search will be completed by October 31, 1978. NRC will be advised upon completion of this investigation with proposed fixes if appropriate.

Sincerely,


J. G. Herbein
Vice President-Generation

JGH:RJS:cjg