

SAFETY EVALUATION
THREE MILE ISLAND NUCLEAR STATION, UNIT 1
DOCKET NO. 50-289

Supplement No. 4 to NUREG-0680, "TMI Restart," noted in Section 6.2.1.4 that the then existing procedure governing valve line-up verification was not explicit regarding how independent verification of valve position was to be accomplished. Specifically, the procedure did not prevent one person from performing an independent verification by watching another person checking a particular valve/breaker position. We noted in Supplement No. 4 that the licensee had committed to issue additional guidance in this area and that the additional guidance would be reviewed by NRR prior to restart, should restart be authorized.

The licensee has now submitted, for NRR review, Revision 13 to TMI-1 Administrative Procedure 1029, "Conduct of Operations." Section 5.16 of AP 1029 addresses the subject of Independent Verification of Components.

The revised procedure specifies that plant components shall be independently verified to be in their proper alignment, when such verification is required by plant procedures. Independent verification of switches and breakers is to be accomplished by two separate personnel visually sighting these components to be in the proper position. When remote light position indicators are provided, the independent verification may be performed using the remote indicators. If the independent verification is being performed following a surveillance test, the person doing the independent verification must be different from the person who signed the first position check as part of the conduct of the surveillance procedure. For manual valves, each party will independently verify proper valve position by physically turning the valve handle in the closed direction. Independent verification by observation is permissible only in cases where the valve is difficult to reach, e.g., such as requiring a ladder. In such cases, the second party may perform the independent verification by physically observing the first party operate the valve. This method is acceptable, however, only when the second party can,

by his proximity, certify that valve operation was sufficient to determine proper valve position.

Our review indicates that the revised procedure assures adequate independence when performing component position verification. We, therefore, conclude that the licensee has made adequate procedural provisions for independent verification of valve/breaker position and that this issue is resolved.