



METROPOLITAN EDISON COMPANY SUBSIDIARY OF GENERAL PUBLIC UTILITIES CORPORATION

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JAN 30 1975

GQL 0710

Mr. Eldon J. Brunner, Chief  
Reactor Operations Branch  
Directorate of Regulatory Operations - Region 1  
U.S. Atomic Energy Commission  
631 Park Avenue  
King of Prussia, PA 19405

Dear Mr. Brunner:

Docket No. 50-289  
Operating License No. DPR-50  
Inspection Report 74-35

This letter and the attached enclosure are in response to your inspection report letter of January 3, 1975, concerning Mr. Spessard's inspection of the Three Mile Island Nuclear Station, Unit 1, and the findings thereof.

In response to apparent violation 1 and your request to be informed as to what specific limiting condition for operation had been violated, please note that we have determined that the event as described in the inspection report constituted exceeding a limiting condition for operation as defined by Technical Specification 3.5.2.4.b.1. Further, we have determined that this event represented an Abnormal Occurrence as defined by Technical Specification 1.8b, but trust that the information contained in the Non-Routine Report 74-06 letter dated November 29, 1974, together with this submittal, satisfactorily addresses any concerns you may have had.

Sincerely,

W. M. Creitz  
President

WMC:RSB:cas

Encl.: Response to Description of Apparent Violation

File: 20.1.1/7.7.3.2.1

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### ENCLOSURE

Metropolitan Edison Company (Met-Ed)  
Three Mile Island Nuclear Station Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Inspection No. 50-289/74-35

#### Apparent Violation 1

Technical Specification 3.5.2.4.b.1 states in part: "Within a period of 4 hours, the quadrant power tilt shall be reduced to less than 4 percent..., or the following adjustments in setpoints and limits shall be made:

1. The protection system reactor power/imbalance envelope trip setpoints shall be reduced 2 percent in power for each 1 percent tilt."

10 CFR 50.36(c) (2) states in part: "When a limiting condition for operation of a nuclear reactor is not met, the licensee shall shut down the reactor or follow any remedial action permitted by the technical specification until the condition can be met."

Contrary to the above, facility records indicated that following the dropped rod occurrence on November 17, 1974, which produced a quadrant power tilt in excess of 4 percent, the tilt was not reduced below the required limit or the reactor power/imbalance trip setpoints were not reduced to the required setpoint within the required period of 4 hours. Actual trip setpoint adjustments for the 4 channels were accomplished over a period of about 6-10 hours following the existence of the excessive tilt condition. Additionally, when Technical Specification 3.5.2.4.b.1 (a limiting condition for operation) could not be met, the reactor was not shutdown in a time period commensurate with the above requirements, i.e., after reducing trip setpoints to the extent capable by design, but which were still in excess of the required limit, reactor operation continued for about 5.5 hours before a shutdown was initiated. (Nonroutine Report 74-06, Telegram to RO:I dated November 18, 1974, and Met-Ed letter dated November 29, 1974).

#### Response

- a. As a corrective action, the Reactor Protection System will be modified to extend the present range of the Power/Imbalance envelope trip setpoints to ensure compliance with Technical Specification 3.5.2.4.b.1 in the event of a tilt up to 25%.
- b. As a preventative action, all responsible management and Shift Supervisors will be instructed regarding 10 CFR 50.36 (c) (2). In addition, OP 1102-4, Power Operation, will be revised to include a precaution regarding the requirements of 10 CFR 50.36 (c) (2).

c. With regard to when compliance will be achieved:

- (1) The modification to the Reactor Protection System will be installed by June, 1975.
- (2) Personnel will be instructed and OP 1102-4 will be revised by February 7, 1975.

Apparent Violation 2

Technical Specification 6.7.2.a.4 states: "Events requiring notification within 24 hours by telephone or telegraph to the Director of Regulatory Operations, Region I, followed by a written report within 10 days to the Director, Directorate of Licensing, USAEC, Washington, D.C. 20545; with a copy to the Director of the Regional Regulatory Operations Office, shall include:

4. Incidents or conditions which prevented or could have prevented the performance of the intended safety function of an engineered safety feature or of the reactor protection system,"

Contrary to the above, the premature tripping of the 1B Engineered Safeguards Motor Control Center feeder breaker due to a faulty overcurrent trip device, which was corrected by Work Request No. 5213 completed on November 6, 1974, was not reported to the AEC, as required.

We note that subsequent to this inspection, you reported this occurrence as AO 74-26 (Telegram to RO:I dated December 2, 1974, and Met-Ed letter dated December 10, 1974.)

Response

- a. It should be noted that the premature tripping of the 1B Engineered Safeguards Motor Control Center feeder breaker was reviewed by the Plant Operating Review Committee (PORC) and the details of this review appear in PORC Minutes #246. The PORC did not consider this to be a reportable item at the time of review. Further, Station Management concurred with PORC's findings, therefore, the required report was not initiated at that time. As a corrective action, the event was reported as Abnormal Occurrence AO 74-26 (Telegram to RO:I dated December 2, 1974, and Met-Ed letter to D.O.L. dated December 10, 1974).
- b. As a preventative action, the Station Superintendent has been counseled regarding what constitutes 24 hour reportable events, and the Station Superintendent has in turn counseled the Unit 1 Superintendent and the PORC.
- c. The above actions have been completed, and full compliance has been achieved.