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METROPOLITAN EDISON COMPANY

A DIVISION OF GENERAL PUBLIC UTILITIES CORPORATION

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April 9, 1975
GQL 0922

Mr. Eldon J. Brunner, Chief
Reactor Operations Branch
Office of Inspection and Enforcement Region I
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pennsylvania 19406

Dear Mr. Brunner:

Docket No. 50-289
Operating License No. DPR-50
Inspection Report 75-04

In response to concerns your office has regarding our Operational Quality Assurance program, the purpose of this letter and the attached enclosure is to:

- a. address the apparent violation which resulted from your Mr. Spessard's February 24-27, 1975, inspection of our Three Mile Island Nuclear Station, Unit 1, and
- b. in addressing a. above, provide sufficient supplemental information to also address your office's remaining, verbally expressed concerns regarding our response to your office's Inspection Report 75-01.

We trust that with this submittal we have adequately addressed all the remaining concerns that you may have had regarding our Quality Assurance program. Should you, however, have any additional questions or concerns, please do not hesitate to call.

Sincerely,

Signed-R. C. ARNOLD

R. C. Arnold
Vice President

RCA:DNG:tas

Enclosure: Response to Notice of Apparent
Violation

File: 20.1.1
7.7.3.2.1

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Metropolitan Edison Company (Met-Ed)
Three Mile Island Nuclear Station Unit 1 (TMI-1)
Docket No. 50-289
Operating License No. DPR-50
Inspection Report 50-289 / 75-04

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Response to Notice of Apparent Violation

Apparent Violation

"Contrary to Criterion III, Appendix B, 10 CFR 50 and the FSAR Section 1A, Operating Quality Assurance Plan, Section III, plant design change C/M 0080, Modification of Diesel Generator Air Start System, was completed during 1974 without receiving prior Generation Engineering Department review and approval as required by Generation Engineering Department Procedure GP 1003, Control of Design Changes.

This infraction was identified by the inspection and had the potential for causing or contributing to an occurrence with Safety Significance."

1. Background Information

The apparent violation in question also constitutes a residual concern remaining from Inspection Report 75-01 (I.R. 75-01) in that:

- a. of the 9 change modifications whose design review had been questioned in I.R. 75-01
 1. 1 of the 9 has been resolved (note: the fact that this item is resolved is acknowledged in I.R. 75-04, page 13, paragraph 1), therefore, this item is no longer of concern,
 2. 7 others of the 9 had sufficient review/approval documentation as per the requirements of the Start-up and Test Program, therefore, these items are also not of concern, but
 3. the 1 remaining of the 9, which is the same C/M in question in this report, did involve changes to a FSAR described system; contrary to what had been reported in our response to I.R. 75-01, it had not been shown that sufficient review/approval documentation existed; and as a result, this change modification is again a subject in question in Inspection Report 75-04.

2. Corrective Actions

Immediate: As immediate corrective action, the Met-Ed Generation Engineering Department has completed a review of C/M 0080, and based on this review a determination has been made that C/M 0080 is adequate and that it does not involve any unreviewed safety questions.

Long Term: Based on a management review of this subject area it has been determined that the only Change Modifications for which additional long term corrective actions need to be taken are those which were initiated by groups outside of the Nuclear Steam System Supply (NSSS) vendor and

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Architect Engineer organizations during the time period from issuance of the TMT-1 Operating License to Commercial Operation (i.e. April 19, 1975, through September 1, 1975). Reason for having made this determination are as follows:

- a. for the time period prior to the date of obtaining our Operating License (April 19, 1975): the technical adequacy and safety implications of initial designs, and design changes initiated prior to April 19, 1975, were properly reviewed and approved in the process of preparing and amending the Safety Analysis Report; therefore, there are no remaining concerns regarding Change Modifications initiated within this time period.
- b. for the time period from the date of commercial operation (September 2, 1975), to the present: the Met-Ed CQA plan, and implementing procedures have been in effect to control all design changes; any design changes initiated during this period have been subjected to the controls of that plan and its implementing procedures (including those initiated by contractors and sub-contractors); therefore, it is the Licensee's position that there should be no remaining concerns regarding the Change Modifications initiated within this time period.
- c. for the time period yet to be addressed (i.e. from the date of issuance of the Operating License (April 19, 1975) to the date of Commercial Operation (September 2, 1975):
 1. the Design Control procedures which were in effect under part a. above were continued for all design changes initiated by the NSSS vendor and Architect Engineer, and further reviewed by Met-Ed management through use of its contracted Start-up and Test Group; therefore, there are no remaining concerns regarding these types of change modifications initiated within this time period, but
 2. for those design changes initiated in this time period by groups other than the NSSS vendor and Architect Engineer, there still exists some degree of concern in that we are still in the process of further reviewing the status of an all inclusive tabular listing of these types of change modifications, to ensure that none of them have been completed without proper design control and safety reviews.

Having identified, therefore, what we consider to be the types of Change Modifications which require long term corrective actions, additional efforts will be taken in this regard as follows:

- a. by April 30, 1975,
 1. a review of the tabular listing referenced in 2.c.(2) above will be completed and will serve to identify any design review and/or safety evaluation problems that may exist for the change modifications in question, and
 2. to provide ourselves with further assurance that there exists no

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problems in the Change Modifications initiated after the date of Commercial Operation, the subject above referenced review will be extended to encompass all Change Modifications initiated from the date of Commercial Operation (September 2, 1974) to the present, and

- b. any design review or safety evaluation problems identified by the subject review will be corrected by June 9, 1975.

3. Compliance

Compliance will be achieved by June 9, 1975.

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4. Additional Item of Information

In response to a verbally expressed Commission concern regarding the General Office Review Board (GORB) review of audits, please be advised that in addition to the post quarterly audit program report actions described in our response to I.R. 75-01, additional actions will be taken as follows:

1. the Manager OQA will send the GORB Audit Subcommittee Chairman a projected 6 month schedule of audits,
2. the GORB Audit Subcommittee will determine which audits they will want to review, and will so inform the Manager OQA,
3. following actual completion of the audits that the GORB Audit Subcommittee desires to review, the Manager OQA will send the subcommittee chairman the audit findings when available,
4. the GORB Audit Subcommittee will review the subject audits, document their review, and report to the GORB on both the projected 6 month schedules and results of their audit finding reviews. The GORB will then make whatever additional recommendations they may deem appropriate to the President of Metropolitan Edison Company.