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October 4 , 1979
GQL 1222

Office of Inspection & Enforcement
Attn: B. H. Grier, Director
Region 1
U. S. Nuclear Regulatory Commission
King of Prussia, Pennsylvania 19406

Dear Sir:

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

As discussed in a phone conversation between L. W. Harding, of my staff, and D. Haverkamp of the NRC Region 1, on October 1, 1979 enclosed please find our response to Inspection Report 50-289/79-10 which is being submitted late.

Sincerely,

J. G. Herbein
Vice President
Nuclear Operations

JGH:DWR:mrn

Enclosures

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Response to Apparent Infraction

In response to this violation, it is the determination of Met-Ed that the required followup actions to preclude repetitive deficiencies were completed in a timely manner and this is exhibited as follows:

1. It should be noted that the five (5) discrepancies noted in Met-Ed surveillance report number 78-69, all would be attributed to lack of supervision by the contractor or contractor personnel failing to follow written procedures. Discrepancies of this type are dependent upon the level of supervision and contractor personnel.
2. Due to these reported deficiencies, Met-Ed attempted to insure adequacy in the procedure review cycle and to obtain the highest confidence in the inspection performed by NES by requesting on June 14, 1978, that NES supply all procedures to Met-Ed which would be used in the 1979 refueling/ISI outage by December 31, 1978.

This attempt was not followed up by NES in a timely manner. Met-Ed received the first NES procedure for review on January 22, 1979. NES was to go to work a short time thereafter, but only after procedures had been reviewed and accepted.

3. In a meeting with Hartford Steam Boiler during the week of February 20, it was agreed that Hartford would perform field surveillance of NES and that the Met-Ed inspector would perform procedure/data review.

We further conclude that Met-Ed nonconformance report 79-18 (review of NES ISI data), dated March 19, 1979, which cites fourteen separate violations of procedure and the resulting rejection of the complete 1979 ISI effort by NES, documents Met-Ed's concentrated efforts and concerns for valid, meaningful program implementation. It should be noted that the violations documented in NCR 79-18 as in surveillance report 78-69, identify lack of supervision of personnel resulting in failure to comply with procedures. The violations cited in NCR 79-18 are also violations which could only have been, and were, found during review of completed data packages.

In direct response to, and as required by, NRC investigation report 50-289/79-10, Met-Ed has taken the following "corrective steps" to improve the effectiveness of the ISI and Quality Assurance Program:

1. Met-Ed will change its approach to ISI in that it will more actively involve itself in the management and execution of the ISI program as opposed to contracting the service outright. While a contractor may be employed, his services will be carefully monitored and controlled under the Met-Ed QA Program. This monitoring will include QA surveillance of contractor personnel during performance of future inspections to ensure procedural compliance. Full compliance will be achieved by 12-31-79 when these QA surveillances will be scheduled.

2. In line with Item 1 above, on June 25 and 26 NES was audited by Met-Ed at their headquarters in Danbury, Connecticut (Audit Number V-79-01). Report V-79-01 identified ten (10) items of non-compliance. On September 27, 1979 NES satisfactorily provided documentation that all ten findings can be closed as verified, therefore, closing Audit V-79-01. Full compliance is now achieved on this item.
3. Under the newly formed TMI Generation Group, Met-Ed has reorganized the ISI Group and its reporting relationship. This reorganization places the responsibility of ASME I, II, and III non-destructive examination portions of ISI under the cognizance of the QA Department. The new organization also includes a full-time NDE Level III. Responsibilities of this second level surveillance of all NDE operations. By direction, the NDE Level III will perform a concentrated review of all ISI non-destruction examination-related procedures and submit revisions, comments, and non-conformances to the Supervisor of QA for dispositioning prior to use of the affected procedure.

All of the above procedure reviews will be completed prior to the expiration of the second forty (40) month period presently scheduled for April 2, 1981. This will constitute full compliance on this item.

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