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WRITER'S DIRECT DIAL NUMBER

December 9, 1983

822-1090

Mr. Samuel J. Chilk
Secretary
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

In the Matter of
Metropolitan Edison Company
(Three Mile Island Nuclear Station, Unit No. 1)
Docket No. 50-289 (Restart)

Dear Mr. Chilk:

Please find enclosed a copy of the following document, which includes information potentially relevant and material to matters under adjudication in the plant design and procedures phase of this proceeding, which is now before the Commission: Letter 5211-83-358, December 9, 1983, H. D. Hukill, GPU Nuclear, to T. E. Murley, NRC, LER 83-044/01T-1.

Respectfully submitted,

Thomas A. Baxter

Thomas A. Baxter
Counsel for Licensee

TAB:jah

Enclosure

cc: Service List

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December 9, 1983
5211-83-358

Dr. T. E. Murley
Region I, Regional Administrator
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
LER 83-044/OIT-1

The attached information is being submitted as revision (1) to Licensee Event Report 83-044 of November 28, 1983. As a result of detailed review, this new information provides a clearer understanding of the circumstances surrounding this occurrence.

Sincerely,

H. D. Hukill
H. D. Hukill
Director, TMI-1

HDH:RAS:vjf

Enclosure

cc: J. Van Vliet

I. CURRENT ACTIVITIES AT THE TIME OF THE OCCURRENCE

Three Mile Island Unit 1 was in cold shutdown. ,

II. CIRCUMSTANCES LEADING TO THE OCCURRENCE

As described in our letter of June 28, 1979, GPUN agreed to provide auto initiation of the motor driven EFW pumps upon loss of both feedwater pumps or loss of 4 RCPs. As first proposed, the system was to be control grade prior to restart, and it was to be upgraded after restart to safety grade. In November 1980, the company committed to establish a safety-grade system (except as noted in NUREG 0680) prior to restart. The principal design modifications necessary for upgrade of the auto initiation system from control grade to safety grade are found in design package SECM 076. This design package, as prepared by the Architect Engineer, did not include specifications for ten existing control grade circuits to which the upgraded system would be connected.

In response to an AE initiative, Installation Specification T1-IS-412012-001 was issued on July 5, 1983 to provide upgraded specifications for these ten circuits (including cables and related conduits). The major specification was for a QA/QC safety-grade review of the ten circuits including a walkdown of the circuits. In response to Field Questionnaire (FQ 8267) the AE was designated to perform the walkdown, and the AE did so on September 21, 1983. The QA/QC review was substantially completed in September-November 1983.

III. DESCRIPTION

It was noted in the walkdown referenced in Section II, and was confirmed by GPUN personnel on November 9, 1983, that 4 feet of cabling in two of the ten circuits were located in the same bundles. This is contrary to safety-grade cable separation criteria. As part of the QA/QC safety grade reviews of the ten circuits, additional documentation was compiled to justify nuclear safety-related designation for the ten circuits.

Since GPUN had previously notified the NRC that the auto initiation system had been upgraded to safety grade, this is considered reportable in accordance with Technical Specification 6.9.2.A.9.

IV. RESULTANT EVENT

No significant occurrence took place as a result of this event.

V. PREVIOUS EVENTS OF A SIMILAR NATURE

None.

VI. ROOT CAUSE

The root cause was a misunderstanding between the Licensee and AE concerning the scope of design package SECM 076. GPUN understood the package included all modifications to complete a safety upgrade of the auto initiation system. The AE understood the package was exclusive of specification for ten existing circuits (EA 6765 & 6766, RU 485-490, RG 282 and 283). The AE understood these ten circuits were to be separately upgraded.

VII. IMMEDIATE CORRECTIVE ACTION

Quality Assurance has completed a safety-grade review of the 10 circuits originally installed as control grade. Appropriate Engineering and Quality Assurance personnel have reviewed the LER. Company procedure EMP-13, which was issued in April 1983, will avoid future communication problems with the vendor by requiring certification by the vendor that the work is performed in accordance with baseline engineering documents. Cable RU 489 has been separated from the existing cable bundle and appropriate electrical separation has been achieved.

VIII. LONG TERM CORRECTIVE ACTION

Completed final documentation for nuclear safety related classification of the 10 circuits will be reviewed by Quality Assurance prior to Restart. Upon completion of this action, the EFW auto initiation system will be safety grade, as committed.

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSION

In the Matter of

METROPOLITAN EDISON COMPANY

(Three Mile Island Nuclear
Station, Unit No. 1)

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Docket No. 50-289
(Restart)

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