GPU NUCLEAR

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April 30, 1997
6710-97-2169

Mr. Hubert J. Miller
USNRC Region 1 Administrator
475 Allendale Road
King of Prussia, PA 19406-1415

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
DPR-50/Docket No. 50-289
Response to Item 2 of Confirmatory Action Letter (CAL) 1-97-008 Quality Classification of Selected Plant Components at TMI-1

Dear Mr. Miller:

Item 2 in Confirmatory Action Letter 1-97-008 reads as follows:

" 2. Determine the impact of the equipment classification downgrade program, as implemented, at TMI and Oyster Creek.

You should report the completion of this item by letter addressed to the Regional Administrator, NRC Region 1, dated on or before April 30, 1997. "

The purpose of this letter is to provide a documented response for TMI-1 to this specific item.

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As part of our immediate corrective action in response to the issues raised on the QCL, steps were initiated to stop work on further programmatic equipment classification downgrades pending procedure and training upgrades, and to establish a process to review planned day-to-day maintenance and modification work involving equipment that was downgraded in order to assure that parts of the correct quality classification are used.

The downgraded items can be placed in the following three categories: 1) items initially classified as "nuclear safety related"(NSR) and downgraded to "regulatory required"(RR) or "Other with QA", or "Other without QA"-there were 1129 items in this category; 2) items initially classified as RR and downgraded to "Other with QA"-there were 3834 items in this category; and 3) items initially classified as RR and downgraded to "Other without QA"-there were 1978 items in this category.

For the first category of items that were initially classified as NSR, item lists were posted to prevent unreviewed activities until safety reviews could be conducted which confirmed the downgraded classification, or affirmed the original NSR classification. The safety reviews on all 1129 items in this category have been completed. Of the 1129 items that were initially classified as NSR, 71 were affirmed as NSR and the remainder are reclassified as RR or Other. A complete review of parts used in the maintenance of these 71 components during the downgrade time period disclosed that 11 parts without basic component qualification were used. All 11 parts are commercial grade items and are not nuclear unique. The impact of the equipment classification downgrade program on previously classified NSR items at TMI has been determined by evaluating the operability of the specific components that were affected. Operability reviews have been completed and have concluded that none of the affected NSR components are inoperable now nor were they inoperable during the period that they were reclassified. However, the 11 parts without basic component qualification require corrective actions to ensure full conformance to their quality classification requirements. These corrective actions and their consequences have been evaluated and there is reasonable assurance that all components will remain operable until the required corrective actions are completed.

All 3834 items in the second category that were downgraded from RR to "Other with QA" have had their classification returned to RR. The impact of this downgrade was reviewed and determined to have no negative impact[1] on past or future operation of plant systems for the following reasons. Although the 3834 items were downgraded, the materials and parts for the downgraded items were not programmatically downgraded and many of the parts which were available for use remained at the RR classification. An extensive review of parts available to Maintenance revealed that less than 400 non-QA parts were available from component "Bill of Materials" for use in components that received maintenance. The downgraded classification maintained the activities associated with the equipment within QA scope, and required corrective and preventative maintenance activities to be performed using QA scope procedures. The procedures which were used require a comparison of replacement parts with existing parts and require post maintenance testing to verify that the equipment will perform its intended function. Based on these facts, we conclude that the operability of the affected components is not impacted now nor was it during the period of time when they were at the lower classification.

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[1] The Auxiliary & Fuel Handling Building Ventilation system has been declared inoperable due to quality classification concerns and has been addressed in LER 97-004.

There are 1978 items in the third category that were downgraded from RR to "Other without QA" which have been evaluated. The evaluation resulted in 649 items being returned to RR and the rest reclassified as Other. The impact of the downgrade on the 649 items was determined to have no negative impact on past or future operation of plant systems for the following reasons. The materials and parts for the downgraded components were not programmatically downgraded and many remained at the RR classification. An extensive review revealed that less than 50 non-QA parts were available from component "Bill of Materials" to Maintenance for use in components that received maintenance. The existing maintenance procedures require a comparison of replacement parts with existing parts and post maintenance testing to verify that the equipment will perform its intended function. We conclude that the operability of the affected components is not impacted now nor during the period that they were reclassified.

GPU Nuclear took action to ensure that QCL deficiencies with a potential to impact plant safety were addressed. For the components with the greatest potential impact on safety (NSR), safety reviews concluded no affect on the operability of those components. Most materials and parts for downgraded RR components remained at the RR classification. This, combined with the controls employed through maintenance procedures, provides reasonable assurance that repaired components are operable and reliable.

Based on the above, GPUN has concluded that although deficiencies existed in the QCL, appropriate action was taken to minimize any affect on safe plant operation including the implementation of corrective action.

If you should have any questions concerning the information in this letter, please contact Mr. Adam Miller, Regulatory Affairs Department, at 717-948-8128.

Sincerely,

James W. Langenbach

James W. Langenbach
Vice President and Director, TMI

AWM

cc: Document Control Desk
TMI Senior Resident Inspector
Director Division of Reactor Safety