

Nuclear

GPU Nuclear Corporation
Post Office Box 480
Route 441 South
Middletown, Pennsylvania 17057
717 844-7621
TELEX 84-2386
Writer's Direct Dial Number:

October 11, 1983
4410-83-L-0244

TMI Program Office
Attn: Mr. L. H. Barrett
Deputy Program Director
US Nuclear Regulatory Commission
c/o Three Mile Island Nuclear Station
Middletown, PA 17057-0191

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Additional Polar Crane Refurbishment Information

1983 OCT 12 PM 3 17
U.S. NUCLEAR
REGULATORY COMMISSION

My staff is in the process of responding to your request for additional information as stated in the above referenced letter. The purpose of this letter is to provide the NRC staff with information available thus far regarding the four items at issue and to inform you of projected dates for the completion of those actions underway but not yet complete. Projected dates for the transmittal of supplemental information are included as well. The order of the below stated partial responses corresponds with that used in the referenced letter.

1. Quality Assurance has performed a review of the work packages used to accomplish the refurbishment of the Polar Crane. Fifty-two packages were reviewed to determine if: the appropriate approvals were obtained, inspection results were documented, acceptable material was used, required tests were performed and tests results were appropriately documented, modifications were approved by engineering, engineering reviewed and approved the as-found conditions as a result of the inspections, and there was overall compliance to administrative controls.

The comments generated as a result of the review were satisfactorily resolved by the Polar Crane Task Group and Design Engineering. There were no material or design problems found, however, it was found that the administrative controls for modifications and testing were not complied with in all cases. These discrepancies were documented on a Quality Deficiency Report. The corrective actions identified were:

- 1) Comply with the administrative controls for modifications and testing for all future work and retrain all Recovery Program personnel responsible for authorizing work activities in these administrative controls;

8310180200 831011
PDR ADDCK 05000320
P PDR

D009
/10

2) convert all Recovery Programs Procedures that are required to satisfy the TMI-2 License, Tech. Specs., Recovery Operations Plan, and Recovery QA Plan into the Unit-2 Procedure Programs; and 3) the Unit Work Instruction will be utilized when required by procedure for all Recovery Programs work activities.

The status of corrective action is as follows:

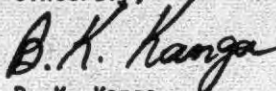
- A. Recovery Programs is in compliance with administrative controls for modification and testing. Recent changes to the technical specifications modifying the safety review process are being accompanied by a revision of the basic procedures governing the accomplishment of work at TMI-2. Training on the new procedural program will be a continuing process as the new procedures are approved and implemented. Please see Item 4 for additional corrective action.
 - B. Conversion of Recovery Programs procedures (CDPI's) into the TMI-2 procedure program is in progress and will be completed by the end of 1982.
 - C. Implementation and authorization of Recovery Programs work activities are done in accordance with the Unit Work Instruction (UWI) procedure.
2. Engineering Change Memoranda (ECM's) for changes not previously covered by this process are being produced now and will be subjected to the normal review routing, including the Site Operations Department. This process will be completed and copies of these approved ECM's made available to the NRC by October 19, 1983. The three ECM's being produced cover modifications regarding the Jib Crane, Trolley Power/Control Bypass Cables, and the Pendant and the Festoon Cable.
 3. The first functional test of the refurbished polar crane was the no-load test. This was successfully performed in February, 1983. Though the Test Working Group (TWG) did not approve the no-load test procedure prior to performance, the TWG met on September 14, 1983, and reviewed the test plan and results. These results, reported by both the Polar Crane Task Group and GPU QC, were verbally approved on September 14, 1983. Formal documentation of TWG approval of the polar crane no-load test will be complete by October 19, 1983.

The polar crane load test was written and reviewed in accordance with AP 1047. The current revision contains all the required TWG approval signatures. The Test Working Group is fully cognizant of all tests completed and contemplated for the refurbished polar crane.
 4. Administrative Procedures (AP 1021, 1043, and AP 1047) and operational requirements (Load Test and Operating Procedures) governing polar crane refurbishment and testing activities will be complied with on a mandatory basis. All personnel involved with polar crane activities, including

contractors, are in the process of training on these procedures and requirements. Training on approved procedures will be complete by November 15, 1983. Training on procedures which are to be yet approved by NRC will be accomplished before implementation of the covered activity.

We are continuing to review and monitor carefully all polar crane modifications, testing, and refurbishment work to ensure compliance with all applicable procedures and administrative requirements, including training, prior to load testing. It is our intention to keep you fully informed of all significant developments in this regard.

Sincerely,



B. K. Kanga
Director, TMI-2

BKK/CMH/jrb

cc: Dr. B.J. Snyder, Program Director - TMI Program Office