



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

October 23, 1979

Docket No. 50-320

Metropolitan Edison Company
ATTN: Mr. R. C. Arnold
Senior Vice President
260 Cherry Hill Road
Parsippany, New Jersey 07054

Gentlemen:

SUBJECT: Meeting on Review and Approval of TMI Recovery Operating Procedures

This refers to a meeting conducted by Mr. R. Conte of this office with members of your staff on September 27, 1979 concerning the above subject matter.

A report on attendees, discussion items along with commitments and resolutions are enclosed. Since all of our concerns have been adequately addressed either by resolution or by the assignment of target dates for completion, we do not anticipate a need for further meetings in this area. The staff inspectors will monitor progress in the resolution of outstanding items.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "John T. Collins".

John T. Collins, Deputy Director
TMI Support

Enclosure: As stated

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Mr. R. C. Arnold

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cc w/encl:

J. G. Herbein, Vice President Nuclear Operations

E. G. Wallace, Manager Licensing

G. P. Miller, Manager Support Services and Logistics

J. B. Logan, Superintendent Unit 2

G. A. Kunder, Unit 2 Superintendent - Technical Support

J. J. Colitz, Manager Plant Engineering

R. F. Wilson, Director TMI-2 Recovery, Acting

I. R. Finrock, Jr.

R. W. Conrad

G. F. Trowbridge, Esquire

J. B. Lieberman, Esquire

Ms. Mary V. Southard, Chairperson, Citizens for a Safe Environment

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PROCEDURES MEETING

September 27, 1979

ATTENDEES

NRC Representatives

D. Brinkman
R. Conte
D. Haverkamp

Licensee Representatives

D. Bates
M. Bezilla
G. Kunder
J. Logan
R. Warren

AGENDA ITEMS

1. Procedure Concerns

- a. The use of handwritten copies of procedures (especially in the area of Special Operating Procedures, SOP's) has caused problems in the past with the ability to distinguish pre-approval and post-approval changes.

RESOLUTION: Formal station procedures will be typed as in the past. Temporary procedures such as SOP's are under review for incorporation into existing formal plant procedures or for cancellation. Remaining SOP's will be typed. In the future SOP's that are handwritten (where time considerations preclude typing) will be controlled through the use of photostated copies attached to the original of the SOP Cover Sheets. The adequacy of these measures will be reviewed by NRC TMI-2 Recovery Operations.

- b. Administrative Controls are needed to clarify the use of Temporary Change Notices (TCN's) for SOP's.

RESOLUTION: Administrative Procedure, AP 1001, will be revised to clarify this area.

- c. SOP's designated Z, EP, R have exceeded 90 day effectiveness. The schedule for review and incorporation into the formal procedure system has yet to be issued. The schedule remains to be implemented.

RESOLUTION: A schedule was issued on October 11, 1979. Schedule implementation will be monitored by NRC TMI-2 Recovery Operations.

- d. Operator training is needed for revised Administrative Procedures as a result of Recovery Technical Specifications (TS).

RESOLUTION: Training should be completed one month after the issuance of Recovery TS.

- e. A tracking system for inaccessible values due to ALARA considerations is needed along with its use for procedural implementation.

RESOLUTION: A Process Radwaste Procedure will be generated by November 15, 1979 to establish this tracking program.

2. NRC/Licensee Interface Items

- a. Distribution of Procedures for NRC. The NRC staff requested to be put on distribution for all NRC approved procedures and for the following categories of procedures:

- Fuel Handling (when revised)
- Administrative (all 1000, except for 1005, Security)
- Health Physics (1600 and 170C)
- Operating Procedures (all 2100)
- Emergency and Abnormal (2202 and 2203 only)
- All Recovery TS Surveillance Procedures (3300 and 4300)

NRC will supply staff personnel to assist in the initial distribution of procedures to NRC files.

A list of Unit 1 procedures will be provided separately.

- b. NRC Review of Procedures. NRC review of procedures including Administrative and Maintenance procedures will continue using the criteria of Proposed Recovery TS A/B 6.8.1. As an example, Administrative Procedures that are revised because of Recovery TS will be reviewed by NRC prior to implementation.

3. NRC "Receipt Acknowledged" Procedures. Changes to these procedures are also required to submit to the NRC in accordance with TS A/B 6.8.2 and 6.8.3.