

SEP 19 1977

APPENDIX A

NOTICE OF VIOLATION

Based on the results of the NRC inspection conducted on August 23-25, 1977, it appears that certain of your activities were not conducted in full compliance with conditions of your NRC Facility License No. DPR-50 as indicated below. These items are infractions.

- A. 10 CFR 50.54 states in part, that "Whether stated therein or not, the following shall be deemed conditions in every license issued: ... (c) Primary reactor containments for water cooled power reactors shall be subject to the requirements set forth in Appendix J."

Appendix J to 10 CFR 50, paragraph III.A.3(c) states: "Test leakage rates shall be calculated using absolute values corrected for instrument error.

Contrary to the above temperatures, pressures and vapor pressures used to calculate leakage rates for the April, 1977, Type A test were not corrected for instrument error.

- B. Appendix B to 10 CFR 50, Criterion XIV states in part, that "... measures shall also be established for indicating the operating status of structures, systems and components of the nuclear power plant... to prevent inadvertent operation."

The Three Mile Island Operation Quality Assurance Plan, Revision 6, Section 19, states, in part, that "The Station Superintendent is responsible for the station procedures relating to the operational status of the entire station."

Contrary to the above, measures which were established did not prevent inadvertent operation, in that PP-V8 and PP-V64 designated as locked open on the locked valve list were found unlocked and shut on August 25, 1977, thus isolating manifolds A and H of the Penetration Pressurization System.

- C. Technical Specification 6.8.1 states in part, that "Written procedures shall be established, implemented and maintained..."

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Administrative Procedure 1011, Revision 12, dated June 6, 1977, paragraph 3.3.1 states, that "The locked valve list shall include the alpha numeric designation of the valve and its locked position and will be maintained in the Locked Valve Book."

The Locked Valve List included the following:

EG-V 1006	Locking device or collar installed
EG-V 1007	Locking device or collar installed
LR-V 1	Locked closed
LR-V 6	Locked closed
LR-V 49	Locked closed

Contrary to the above, on August 25, 1977, the EG valves had no locking device or collar installed and the LR valves were not locked.

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