

ENCLOSURE 1

NOTICE OF VIOLATION

Metropolitan Edison Company
P.O. Box 542
Reading, Pennsylvania 19603
Docket No. 50-289
License No. DPR-50

Based on the results of an AEC inspection conducted on January 6-9 and 17, 1975 it appears that certain activities were not conducted in full compliance with conditions of your AEC license as indicated below:

1. Criterion VI, Appendix B, 10 CFR 50 states in part that, "Measures shall be established to control the issuance of...procedures...including changes thereto, which prescribe all activities affecting quality." The FSAR Section 1A, Operation Quality Assurance Plan, Section VI states in part that, "...the Generation Division document control procedure further requires that each Manager and Station Superintendent provide in their procedures measures: ...to ensure that approved changes be promptly transmitted for incorporation into documents; and to ensure that obsolete or superseded documents are eliminated from the system and not used...."

Contrary to the above, on November 19-20, 1974 plant heatup was performed using a controlled copy of OP 1102-1, Rev. 4 which contained 4 TCN's that were invalid. Additionally, on January 7, 1975 the Control Room File copy of OP 1102-1, Rev. 4 still contained the 4 invalid TCN's and did not contain the one valid TCN issued after the November 19-20, 1974 plant heatup evolution. It was determined that the 4 invalid TCN's were not followed during the heatup evolution.

This infraction was identified by the inspector and had the potential for causing or contributing to an occurrence of safety significance. This infraction is also a repetitive item of noncompliance, as described in a letter dated June 21, 1974 following inspection number 50-289/74-25.

The immediate corrective actions taken by the license and the licensee's commitment regarding disposition of existing TCN's were reviewed during this inspection. We have no further questions regarding this aspect of this repeat infraction at this time.

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2. 10 CFR 50.59b states in part; "...the licensee shall maintain records of changes in the facility...made pursuant to this section, to the extent that such changes constitute changes in the facility as described in the safety analysis report...these records shall include a written safety evaluation which provides the bases for the determination that the change, ...does not involve an unreviewed safety question." 10 CFR 59a states in part; "that a proposed change... shall be deemed to involve an unreviewed safety question (1) if the probability of an accident...is increased (2) if a possibility for an accident...may be created or (3) if the margin of safety...is reduced...."

Contrary to the above the licensee's written safety evaluations for nine design changes completed in 1974, did not provide an adequate bases for the determination that an unreviewed safety question was not involved, in that the items constituting an unreviewed safety question, as defined above, were not addressed.

This infraction was identified by the inspector and had the potential for causing or contributing to an occurrence with safety significance.

3. Criterion XVIII, Appendix B, 10 CFR 50, states in part, "a comprehensive system of planned and periodic audits shall be carried out...audit results shall be documented and reviewed by management having responsibility in the area audited...." The FSAR Section 1A, Operating Quality Assurance Plan Section XVIII, states in part; "...audit reports are transmitted...to the responsible managers or outside organizations..."

Contrary to the above two audits conducted by the licensee (Audit Nos. 74-13 and 74-27) were not documented and distributed to management having responsibilities in the areas audited. Additionally, audit reports for two audits (Nos. 74-25 and 74-29) which were conducted on September 16, 1974 and October 28, 1974, respectively had not been issued as of January 9, 1975; period of 115 days and 73 days, respectively following audit performance.

This infraction was identified by the inspector and had the potential for causing or contributing to an occurrence with safety significance.

4. Criterion XVI, Appendix B, 10 CFR 50, states in part; "...that measures shall be established to assure that conditions adverse to quality, such as..., deficiencies, deviations...and non-conformances are

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promptly identified and corrected." The FSAR Section 1A, Operating Quality Assurance Plan Section XVI, states in part; "...the corrective action procedures include provisions for...the responsibility for timely disposition and followup action for nonconformances...."

Contrary to the above several of the licensee's nonconformances identified during his audits of the quality assurance program have not received prompt corrective action. For example, Audit Findings No. 74-11-4, 74-11-6, and 74-12-3 were targeted for completion by July 20, 1974; however, these were still open as of the date of the inspection, a period of about 6 months.

This infraction was identified by the inspector and had the potential for causing or contributing to an occurrence with safety significance.

5. Technical Specification Section 6.1.I.3.e.8) states that "The General Office Review Board (GORB) will review audits and audit program of the Generation Division."

Contrary to the above, the GORB has not performed this review since the issuance of an operating license on April 19, 1974 (a period exceeding 9 months) although the GORB held 7 meetings during the period April - October 1974.

This deficiency was identified by the inspector.

One infraction identified through your internal audit program and which was reported in a timely manner and corrective action was initiated is set out in this inspection report. This infraction is also a repetitive item of noncompliance, as described in a letter dated July 1, 1974 following inspection number 50-289/74-26. This item will be reviewed for timeliness of your corrective action during a subsequent inspection. No additional response is needed for this item at this time.

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