

APPENDIX A

NOTICE OF VIOLATION

Metropolitan Edison Company
Three Mile Island Unit 2

Docket No. 50-320
License No. DPR-73

As a result of the inspection conducted February 1 - March 28, 1981, and in accordance with the Interim Enforcement Policy, 45 FR 66754 (October 7, 1980) the following violation was identified.

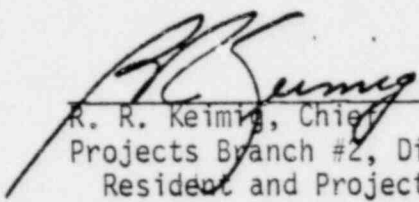
The Order for Modification of License, dated July 20, 1979, as amended by the Order dated February 11, 1980, states in part: "...Pending further amendment of the Facility Operating License, the licensee shall maintain the facility in accordance with the requirements set forth in Attachment 1..." (Proposed Technical Specification, Appendix A to License No. DPR-73). The proposed Technical Specification 6.8.1.a states in part: "Written procedures shall be...implemented covering...the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1972...." Appendix 'A' of Regulatory Guide 1.33 listed Administrative Procedures for station procedure adherence and temporary change methods. Further, proposed Technical Specification 6.8.3.1.a states in part: "Temporary changes to procedures...may be made provided...the intent of the original procedure is not altered...." Station Administrative Procedure AP 1001, Revision 23, February 16, 1981, TMI Document Control, paragraph 3.6.4.2.a, line 7, requires in part that when the intent of a station procedure is altered, a Temporary Change Notice (TCN) must receive Plant Operations Review Committee (PORC) review, and the Unit Superintendent's (Director, Site Operations, TMI-2) approval prior to implementation.

Contrary to the above, on March 6, 1981, the intent of Station Operating Procedure 2104-4.39, Revision 1, August 22, 1980, Solid Radwaste Disposal System Compacting Radioactive Waste, was altered by the implementation of TCN No. 2-80-48, dated March 6, 1981, without prior PORC review and the Unit Superintendent's (Director, Site Operations, TMI-2) approval. This TCN deleted a radiation level limit for trash compacting.

This a Severity Level V violation (Supplement IV).

Pursuant to the provisions of 10 CFR 2.201, Metropolitan Edison Company is hereby required to submit to this office within twenty-five days of the date of the Notice, a written statement or explanation in reply including the corrective steps which have been taken and results achieved; corrective steps which will be taken to avoid further violations; and the date when full compliance will be achieved. Under the authority of Section 182 of the Atomic Energy Act of 1954, as amended, this response shall be submitted under oath or affirmation.

Date MAY 06 1981



R. R. Keimig, Chief
Projects Branch #2, Division of
Resident and Project Inspection