

APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation
Three Mile Island, Unit 1

Docket No. 50-289
License No. DPR-50

As a result of the Maintenance Team Inspection conducted from December 4-15, 1989 and January 22-25, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions, 10 CFR Part 2, Appendix C (Enforcement Policy) (1989), the following violation was identified:

Three Mile Island, Unit 1 Technical Specification 6.8.1 requires that written procedures shall be established, implemented and maintained as recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, which includes procedures for equipment control and the control of measuring and test equipment.

Contrary to the above, the following examples of failure to properly implement procedures were identified:

- A. Licensee Procedure AP-1002, Rules for the Protection of Employees Working on Electrical and Mechanical Apparatus, Section 4.2.5 states that for tagging applications which contain only red tags, more than one party may be granted clearance to work on a job at a time provided proper documentation is made on the Clearance Control Document. Electrical modifications which required red tags were being performed on December 4-5, 1989 on the "A" emergency diesel generator by electrical maintenance personnel. Clearance for this work each day was not documented on the Clearance Control Document.
- B. Licensee Procedure 1407-1, Unit 1 General Corrective Maintenance Procedure, Enclosure 4, requires that, (1) in-plant storage areas of equipment be access controlled so that unauthorized tampering does not occur, (2) materials with a shelf life expiration date must be observed and (3) materials removed from the plant be tagged with as much information as is reasonably available at the time of removal. During tours of storage areas on December 7-8, 1989 (1) access control was not being maintained for the electrical and mechanical equipment storage areas, (2) shelf life material was stored such that the expiration date could not be determined, and (3) material removed from the plant was observed to be stored with no accompanying tag.
- C. Licensee Procedure 1022, Control of Measuring and Test Equipment, requires that, a test equipment usage card be completed each time equipment is issued and used. On December 7, 1989, six pieces of test equipment were out of their controlled storage location with no equipment usage card having been completed.

These examples are collectively considered as one Severity Level IV Violation (Supplement I).

Pursuant to the provisions of 10 CFR 20.201, GPU Nuclear Corporation is hereby required to submit to this Office within 30 days of the date of the letter transmitting this Notice, a written statement or explanation in reply including for each violation: (1) the reason for the violations if admitted; (2) the corrective steps which have been taken and the results achieved; (3) the corrective steps which will be taken to avoid further violations; and, (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.