

NOV 03 1993

Docket No. 50-289

EA No. 93-193

Mr. T. Gary Broughton
Vice President and Director, TMI-1
GPU Nuclear Corporation
Three Mile Island Nuclear Station
P. O. Box 480
Middletown, Pennsylvania 17057-0191

Dear Mr. Broughton:

Subject: Inspection No. 50-289/93-08

This letter refers to your September 10, 1993 correspondence, in response to our August 11, 1993 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Thank you for your cooperation.

Sincerely,

Original Signed By
Susan Frant Shankman

for Charles W. Hehl, Director
Division of Radiation Safety
and Safeguards

cc:

R. E. Rogan, TMI Licensing Director
M. J. Ross, Operations and Maintenance Director, TMI-1
J. Fornicola, Licensing and Regulatory Affairs Director
TMI-1 Licensing Department
E. L. Blake, Jr., Esquire
TMI-Alert (TMIA)
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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bcc:

Region I Docket Room (with concurrences)

bcc (VIA E-MAIL):

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M. Young, OGC
D. Holody, RI
M. Banerjee, RI
C. Hehl, RI
S. Shankman, RI
J. Joyner, RI
E. McCabe, RI

RI:DRSS

Laughlin/tmh/slj

10/21/93

RI:DRSS

McCabe

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September 10, 1993
C311-93-2130

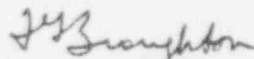
U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50,
Docket No. 50-289
"Reply to a Notice of Violation" - Inspection Report 93-08

Enclosed is the GPU Nuclear reply to the Notice of Violation transmitted by
Inspection Report 93-08.

Sincerely,


T. G. Broughton
Vice President and Director, TMI-1

DVH/emf

Attachment

cc: Region I Administrator, NRC
TMI-1 Senior Project Manager, NRC
TMI Senior Resident Inspector, NRC

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NOTICE OF VIOLATION

The Three Mile Island Unit 1 Operating License, Section 2.c(4), Fire Protection, requires the licensee to implement and maintain in effect all provisions of the Fire Protection Program as described in the Updated Final Safety Analysis Report (UFSAR).

The Three Mile Island Unit 1 UFSAR specifies that plant fire protection systems will comply with National Fire Protection Association (NFPA) and Commonwealth of Pennsylvania Codes.

NFPA 101, Life Safety Code, Section 5-2.1.2.1.2, states that a latch or other fastening device on a door shall be provided with a knob, handle, panic bar, or other simple type of releasing device, the method of operation of which is obvious, even in darkness.

NFPA 80, Standard for Fire Doors and Windows, Section 1-4, defines a fire door assembly as any combination of a fire door, frame, hardware, and other accessories which together provide a specific degree of fire protection to the opening.

NFPA 80, Section 2-8.2.1, states that only labeled locks and latches or labeled fire exit hardware (panic devices) meeting both life safety requirements and fire protection requirements shall be used.

Contrary to the above, from the time of installation of deadbolts on Control Room Fire Doors C415 and C418 (date unknown due to incomplete licensee records) through June 10, 1993, the licensee did not maintain in effect all provisions of the UFSAR fire protection program, in that the Control Room Fire Doors were not equipped with proper fire exit hardware. Specifically, Fire Doors C415 and C418 did not meet life safety criteria in that the locks were not fitted with simple releasing devices. Instead, they were fitted with deadbolt locks that required a key for unlocking from either side, thereby potentially impeding Control Room egress in case of fire. Further, these doors had a three-hour fire rating and were equipped with locks that did not have an equivalent fire rating.

This is a Severity Level IV violation (Supplement I).

GPU NUCLEAR RESPONSE TO THE NOTICE OF VIOLATION

This Notice of Violation (NOV) resulted from investigation of the February 7, 1993, Intruder Incident at TMI. The Control Room Fire Doors were locked during the incident. An NRC inspection in June 1993 revealed that improper locks were installed. GPU Nuclear concurs with this finding. The locks were changed as described below.

I. Reason for the Violation

GPU Nuclear believes the locks in question were installed in the 1981 timeframe utilizing a blanket job order for repairs of doors. The blanket job order did not contain caution statements or requirements specific to fire doors. The locks were installed as a result of an observation by the Control Room staff during a security drill. The Control Room staff believed installing locks on the Control Room fire doors would provide an additional level of protection during a security event.

II. Corrective Steps That Have Been Taken and the Results Achieved

To immediately address the situation, GPU Nuclear installed non-UL deadbolts on the doors with available locksets that met fire egress requirements by having deadbolt operation thumbknobs on the Control Room side. This action was completed by June 10, 1993. On June 21, 1993, these locks were replaced by similar locks that were UL rated.

III. Corrective Steps That Will be Taken to Avoid Further Violations

GPU Nuclear has confirmed that no other fire doors have locks that are not UL rated or specifically approved for the application. Utility personnel also have been briefed on the requirement to use UL rated locks on fire doors. These two actions serve as interim steps to preclude future occurrences.

Installation of additional locks on fire doors using current work control methods requires this work to be a modification requiring a specific job order. Appropriate controls which address fire protection requirements are contained in this process. As an added level of assurance, Procedure U-22, Door Maintenance and Inspection, will be revised to include a step during the preventive maintenance checks that the doors' hardware, such as locks on fire doors, are verified as UL rated.

IV. Date of Full Compliance

As noted above, confirmation that no other fire doors have a similar problem and the briefing of utility personnel has been completed. Procedure U-22 will be revised by January 1, 1994, or prior to the next inspection of fire doors using this procedure, whichever occurs first.