



GPU Nuclear Corporation
Post Office Box 388
Route 9 South
Forked River, New Jersey 08731-0388
609 971-4000
Writer's Direct Dial Number:

(717) 948-8005

December 13, 1993
C311-93-2171

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 93-23

Enclosed is the GPU Nuclear reply to the Notice of Violation transmitted as an enclosure to Inspection Report 93-23.

Sincerely,

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

AWM/mkk

Attachment

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

170031

9312200220 931213
PDR ADOCK 05000289
Q PDR

IE01
111

NOTICE OF VIOLATION

Technical Specification (TS) 6.12.1.a. states, in part, that "In lieu of the "control device" or "alarm signal" required by paragraph 20.203(c)(2) of 10 CFR 20: Each High Radiation Area as defined by paragraph 20.202(b)(3) shall be barricaded and conspicuously posted as a High Radiation Area, and personnel desiring entrance shall obtain a Radiation Work Permit (RWP)."

Contrary to the above, on October 4 through 8, 1993, the inspector found several examples of high radiation areas where the licensee did not barricade or properly control access to prevent inadvertent entry. The high radiation areas without proper access controls were found in the Auxiliary Building and the Reactor Building. The duration of these conditions was indeterminable.

The examples listed above in aggregate constitute a Severity Level IV violation.

GEJ NUCLEAR RESPONSE TO THE NOTICE OF VIOLATION

I. Reason for the Violation

The improperly barricaded High Radiation Area (HRA) in the Auxiliary Building involved a ladder leading to a platform about 10 feet above the floor with a posting indicating dose rates above 100 millirem per hour during fuel transfer operations. The ladder was posted with a HRA sign hanging from one rung of the ladder. There was no barricade at the bottom of the ladder or on the platform at the top of the ladder.

The reason for this violation was the Radiological Controls technician improperly implementing the procedural requirements. The technician's understanding of what constituted a barricade was insufficient for this situation. In addition, it is possible that other Radiological Controls personnel failed to notice this discrepancy during their routine tours and inspections.

Several HRA postings and barriers in the reactor building were moved or repositioned by workers and not placed back in their original positions. The areas were marked by a step-off pad on the floor and a swing arm gate with an HRA posting. Two swing arm gates were propped open against a wall or railing with the posting facing the other way and not visible to someone entering the HRA. In another instance, the entire swing arm gate was moved about five feet away and to the side of the step off pad, so that it did not barricade the entrance to the HRA. The reason for these discrepancies in the reactor building was that the barricades interfered with the worker's job. When moving large equipment, these barricades impeded the worker's progress. The worker's awareness of the importance of the integrity of these barricades was inadequate.

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

The Manager, Radiological Controls Field Operations, TMI-1 issued a memorandum to his supervisors and technicians, which stresses the importance of HRA postings and barricades. This Manager also discussed with the craft supervision and the plant maintenance supervision the importance of HRA postings and barricades. Radiological Controls Management tours have specifically looked for problems in HRA postings and barricades since these incidents and no reoccurring problems have been noted.

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

This problem has been documented in a Radiological Awareness Report (RAR). This RAR specifies corrective action steps to prevent further violations. These actions are as follows:

1. Place an item on the Radiological Controls Outage preparation punch list to discuss the importance of HRA postings and barricades with contractor and plant supervision.
2. The locations of normally used HRA swing gate barricades will be reviewed to determine whether the location should be changed and how these barricades could be modified so that they are more difficult to move.
3. Review the content of the General Employee Training (GET) Program relative to HRA barricades. Revise GET if necessary.

IV. Date of Full Compliance

The corrective actions described above will be completed by March 31, 1994.