

GPU Nuclear Corporation

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January 20, 1983 5211-83-021

Mr. R. C. Haynes Region I, Regional Administrator U. S. Nuclear Regulatory Commission 631 Park Avenue King of Prussia, PA 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Response to Inspection Report 50-289/82-21

This letter is submitted in response to the subject report, Notice of Violation dated December 9, 1982. Attachment 1 contains our reply and specific corrective actions in accordance with the provisions of 10 CFR 2.201. This response is provided within the 10 day extension period provided after consultation with the Senior Resident Inspector, Mr. R. Conte.

Sincerely,

Director, TMI-1

HDH:CJS:vjf Enclosures cc: Mr. R. Conte

Sworn and Subscribed to before me this 20th day of January , 1983.

Notary Public

OARLA JEAN BERRY, NOTARY PUBLIC MIDDLETOWN BORD, DAUPHIN COUNTY MY COMMISSION EXPIRES JUNE 17, 1985
Member, Pennsylvania Association of Notares

ATTACHMENT I

RESPONSE TO INSPECTION REPORT 50-289/82-21

NOTICE OF VIOLATION

As a result of the inspection conducted on October 5, 1982, Chrough November 8, 1982, and in accordance with the NRC Enforcement Policy (10 CFR Part 2, Appendix C), 47 FR 9987 (March 9, 1982), the following violation was identified.

10 CFR 50.59.(b) requires, in part, that a record be maintained of the written safety evaluation which provides the basis for the determination that a change to the facility as described in the safety analysis report does not involve an unreviewed safety question.

Contrary to the above, on November 8, 1982, a written safety evaluation was not available for installation of mechanical aspects for the reactor coolant system safety valve position indications (differential pressure elbow taps and acoustic monitor per GPU Nuclear Engineering Change Memorandum No. 057, Revision 3, dated September 17, 1980). The installation is a change to the facility as described in the safety analysis report.

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

RESPONSE

1. Corrective Actions Taken and Results Achieved.

GPU has reviewed the history of Engineering Change Memorandum (ECM) No. 057, Revision 3, dated September 17, 1980. It appears from this review that a scope change occurred in Revision 3, which changed a portion of the ECM 057 package to Nuclear Safety Related by virtue of relocating the condensing pots. The elbow pressure taps and the acoustic monitor were not a part of ECM No. 057 but were part of ECM Nos. 046, Rev. 0 and 011, Rev. 1 respectively. Safety evaluations were and are available for ECM's 046 and 011. Engineering personnel in the field apparently did not review in detail the original safety evaluation for ECM 057 when Rev. 3 was issued, even though it did change its classification to "Nuclear Safety Related". In order to correct this problem the safety evaluation has been revised to include the new scope of work.

2. Corrective Steps Which Will Be Taken to Avoid Furthe Violations

In order to prevent recurrence, a memo has been sent to Engineering Supervisory Personnel addressing this particular concern and reminding them of their obligation to carefully review the original safety evaluations to ensure that scope of work changes, if any, are duly reflected in the safety evaluations. This memo was issued January 14, 1983.

3. Date When Full Compliance Will Be Achieved

Full compliance was achieved December 6, 1982.