

Enclosure 1  
**NOTICE OF VIOLATION**

GPU Nuclear Corporation  
Three Mile Island Nuclear Generating Station - Unit 1

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

During an NRC inspection conducted on January 18, 1994 - February 28, 1994, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. Technical Specification 6.8.1.a states, in part, that written procedures shall be established, implemented and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, step 3 states, in part, that instructions should be prepared as appropriate for draining the reactor coolant system (RCS).

Contrary to the above, the licensee failed to establish an adequate procedure for draining the reactor coolant system because Operating Procedure (OP) 1103-11, "Draining and Nitrogen Blanketing of the Reactor Coolant System," did not address how to minimize or prevent the reactor vessel level effects from the spill over of reactor vessel water into the cold legs as the cold legs are drained. As a result, on November 16, 1993, the indicated reactor vessel level on level transmitter LT-1037, twice dropped below the curve of OP 1103-11, Figure 10, "Minimum Height of Water Required to Avoid Vortex Formation vs. Decay Heat Flow."

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

- B. 10 CFR 50.9(a) requires that information required by statute or by Commission's regulations shall be complete and accurate in all material respects. Technical Specification 6.8.1a states, in part, that written procedures shall be implemented covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Revision 2, February 1978, Appendix A, identifies safety-related activities that should be covered by written procedures. Item 1.h. under Administrative procedures identifies log entries as an activity that should be covered by procedures.

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Contrary to the above, the licensee determined that records required to be maintained by Commission regulations or license conditions were not complete and accurate in all material respects. On January 27, 1994, on the 7 a.m. to 3 p.m. shift, the auxiliary operator performing the Outbuildings Tour Log, recorded two readings for the River Water Fire Service Diesel Building without entering the building to perform the readings. This error was material in that it evidenced that checks had been made when they had not.

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

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit a written statement or explanation to the U.S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555; with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector, within 30 days of the date of receipt of the letter transmitting this Notice of Violation. This reply should be clearly marked as a "Reply to a Notice of Violation" and should include for each violation: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that 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.

Dated at King of Prussia, Pennsylvania  
this 30th day of March, 1994.

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