

SEP 14 1990

Docket No. 50-289

GPU Nuclear Corporation  
ATTN: Mr. H. D. Hukill  
Vice President and Director of TMI-1  
P. O. Box 480  
Middletown, Pennsylvania 17057

Gentlemen:

Subject: Inspection No. 50-289/90-10

This refers to your letter dated July 27, 1990, in response to our letter dated June 27, 1990.

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.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:  
Clifford J. Anderson

Jacque P. Durr, Chief  
Engineering Branch  
Division of Reactor Safety

cc:

T. G. Broughton, Operations and Maintenance Director, TMI-1  
C. W. Smyth, Manager, TMI-1 Licensing  
R. J. McGoey, Manager, PWR Licensing  
E. L. Blake, Jr., Esquire  
TMI-Alert (TMIA)  
Susquehanna Valley Alliance (SVA)  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

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SEP 14 1990

GPU Nuclear Corporation

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bcc:

Region I Docket Room (with concurrences)

Management Assistant, DRMA (w/o encl)

R. Bellamy, DRSS

DRP Section Chief

M. Conner, SALP Reports Only

K. Abraham, PAO (20) SALP Report and (2) All Inspection Reports

J. Caldwell, EDO

R. Hernan, PM, NRR

RI:DRS *LSC*  
Cheung/cmm

09/12/90

*c/a*  
RI:DRS  
Anderson

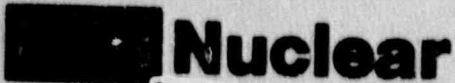
09/13/90

*c/a for*  
RI:DRS  
Durr

09/13/90

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09/11/90



**GPU Nuclear Corporation**  
 Post Office Box 480  
 Route 441 South  
 Middletown, Pennsylvania 17057  
 717-474-7621  
 TELEX 64-2386  
 Writer's Direct Dial Number:

July 27, 1990  
 C311-90-2104

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

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
 Operating License No. DFR-50  
 Docket No. 50-289  
 Response to Notice of Violation in  
 Inspection Report 90-10

Enclosed is GPUN's response to the Notice of Violation in Appendix A to  
 Inspection Report 90-10.

Sincerely,

H. D. Hukill  
 Vice President & Director, TMI-1

HDH/DJD/plp

Attachment

cc: R. Hernan  
 T. Martin  
 J. Stolz  
 F. Young

Sworn and subscribed to  
 before me this 27<sup>th</sup> day of  
July, 1990.

Notary Public

Notarial Seal  
 Debra S. Kildic, Notary Public  
 Londonderry Twp., Dauphin County  
 My Commission Expires July 4, 1994  
 Member, Pennsylvania Association of Notaries

Notice of Violation

10 CFR 50, Appendix B, Criterion V requires that activities affecting quality be accomplished in accordance with procedures..."

Licensee Procedure No. SP-1101-41-003, Revision 2 for "Installation of Electrical Equipment," Section 4.4.3, Item C, states, in part that: "Six (6) inch minimum free air space shall be maintained between redundant wiring...from the raceway entrance to the termination points..."

Contrary to the above, on May 11, 1990, the 120 VAC redundant power cables from containment high range radiation monitors RMG-22 and RMG-23 were found tied together within the PRF cabinet.

This violation is a Severity Level IV, Supplement I.

GPUN Response

GPUN agrees with this violation as presented in Inspection Report (IR) 90-10. In response to the inspection finding, GPUN performed an additional evaluation of the entire containment high range radiation monitor installation and walked down the affected cable routings outside containment.

GPUN letter C311-90-2085, dated July 19, 1990 provided a detailed discussion of the inspection finding which resulted in the above violation and also identified two subsequent related issues regarding the power cables for RMG-22 and RMG-23 and isolation of the Class 1E recorder output. These radiation monitors and associated instrumentation were originally installed to meet NUREG-0737 requirements as a plant restart commitment. These instruments were installed in accordance with NUREG-0737, Appendix B design criteria to the extent practicable. Physical separation of the power cables between the Distribution Panels and Control Room Panel PRF was not provided at that time because Panel PRF was non-seismic. Panel PRF has subsequently been seismically qualified. The lack of physical separation between the redundant power cables and Class 1E recorder output isolation was an oversight when these radiation monitors and associated instrumentation were evaluated for compliance with Regulatory Guide 1.97, Category 1, design requirements. As discussed with NRC Region I on June 1, 1990 and documented in the above referenced GPUN letter, the plant operators can continue to rely on these instruments and these monitors are considered to be operable in accordance with Technical Specification requirements.

Corrective Actions Taken and Results Achieved

Additional evaluation of the containment high range radiation monitor installation and circuit walkdowns were performed to identify any other potential design deficiencies. A missing support brace on an associated cable tray support was found and corrected. No other immediate corrective actions are necessary since these monitors can be relied upon to perform their post-accident monitoring function, if required.

Corrective Actions to Prevent Recurrence

Installation of electrical equipment will continue to be performed in accordance with GPUN System Design Description (SDD) 772-A, "TMI-1 Nuclear Generating Station Electrical Cable and Raceway Routing," and Specification SP-1101-41-003, "Installation of Electrical Equipment" to ensure compliance with the appropriate electrical design criteria in the future.

As stated above, the subject design deficiency was an oversight during the evaluation of the existing RMG-22 and RMG-23 installation to meet Regulatory Guide 1.97, Category 1 design criteria.

Date of Full Compliance

Physical separation of the power cables as specified by SDD 772-A, and the required isolation will be provided to satisfy Regulatory Guide 1.97 Category 1 requirements. The modifications to provide physical separation and isolation are being evaluated for potential implementation during the upcoming 9R outage. Final scheduling for these modifications will be done in accordance with the Integrated Schedule evaluation process.