

9-14-82  
APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation  
Three Mile Island Unit 2

Docket No. 50-320  
License No. DPR-73

As a result of the inspection conducted on July 6-August 7, 1982, and in accordance with the Federal Register Notice (47 FR 9987) dated March 9, 1982, the following violations were identified.

- A. The Order for Modification of License, dated July 20, 1979, as amended by the Order dated February 11, 1980, states, in part: "...Pending further Amendment of the Facility Operating License, the licensee shall maintain the facility in accordance with requirements set forth in Attachment 1..." (proposed Technical Specification, Appendix A to License No. DPR-73). Proposed Technical Specifications, Appendix A, Section 6.8.1, requires, in part, that "written procedures be...implemented...covering the activities referenced in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978 and the Unit 2 Radiation Protection Plan". Specific activities referenced in Regulatory Guide 1.33 include access control to radiation areas including a Radiation Work Permit (RWP) system and personnel monitoring.

Radiological Controls Procedures (RCP) 4200, Thermoluminescent Dosimeter (TLD) Assignment, Issue, and Data Handling, Revision 5, effective June 5, 1982, requires in paragraph 2.1.1, that TLD's be worn by personnel in site radiation areas which are posted as "personnel monitoring required" areas, and RCP 4122, Radiation Work Permit, Revision 3, effective June 22, 1982, requires in paragraph 2.2.5 that an RWP is required of all personnel whose work involves entering any area posted "RWP Required for Entry."

Contrary to these requirements, on July 15, 1982, personnel entered the Dosimetry Calibration Building, an area posted as "Personnel Monitoring Required" and "RWP Required for Entry", without obtaining personnel monitoring devices and without obtaining an RWP.

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

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- B. The Order for Modification of License, dated July 20, 1979, as amended by the Order dated February 11, 1980, states, in part: "...Pending further Amendment of the Facility Operating License, the licensee shall maintain the facility in accordance with requirements set forth in Attachment 1..." (proposed Technical Specification, Appendix A to License No. DPR-73). Technical Specifications, Appendix A, Section 6.8.1, requires, in part, that "written procedures be established...covering the activities referenced in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978." Regulatory Guide 1.33 states in Appendix A, paragraph 8, Procedures for Control of Measuring and Test Equipment and for Surveillance Tests, Procedures and Calibration, that "...procedures...be provided to ensure that...measuring devices...are properly controlled, calibrated, and adjusted at specific periods to maintain accuracy."

Contrary to this requirement, Radiological Control Procedure 1772, Dosimeter Calibration and Leak Test, Revision 6, effective January 12, 1982, was inadequate in that it did not establish the frequency of recalibration nor describe the recall system for properly controlling self-reading dosimeters.

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

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply, including (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.

Dated \_\_\_\_\_

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Richard W. Starostecki, Director  
Division of Project and Resident  
Programs