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 Writer's Direct Dial Number:

C311-90-2154  
 December 26, 1990

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

Dear Sir:

Three Mile Island Nuclear Station, Unit (TMI-1)  
 Operating License No. DPR-50  
 Docket No. 50-289  
 Response to Notice of Violation  
 in Inspection Report 90-15

Enclosed is GPUN's response to the Notice of Violation in Appendix A to Inspection Report 90-15. This response also addresses IR 90-18, which includes a third example of the violation cited in IR 90-15 and provided a revised date for responding.

Sincerely,

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

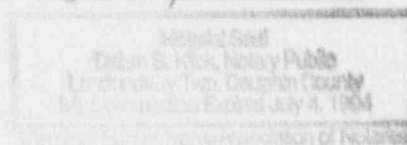
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Attachment

Sworn and subscribed to  
 before me this 26th  
 day of December, 1990.

Notary Public

cc: Region I Administrator, NRC  
 Director, Project Directorate I/4, NRC  
 Senior Project Manager, TMI-1, NRC  
 Senior Resident Inspector, TMI-1, NRC



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Notice of Violation

Technical Specification 6.8.1 requires that written procedures shall be established and implemented for surveillance and test activities of equipment that affects nuclear safety and for maintenance that can affect the performance of safety-related equipment.

Contrary to the above:

- a. On August 22, 1990, the licensee failed to adequately establish Surveillance Procedure (SP) 1303.4.1 "Reactor Protection System." Step 8.6 did not provide [sic] adequately establish the initial conditions for testing RPS response. The step failed to reset the bistable after testing the previous function. This could have resulted in a Reactor Protection System not being fully tested.
- b. On September 10, 1990, the licensee failed to adequately implement Preventive Maintenance Procedure E-18, "Battery Chargers Annual Inspection." The prerequisite to perform the specific checklist required by step 1.1.1. was not accomplished.
- c. As a third example, during the performance of E-18 described in b. above, the hand written guidance used was different from the procedure and as a result, step 6.6 was not performed as written (IR 90-18).

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

GPUN Response

I. Admission or denial of the violation

GPUN accepts the above violation.

II. Reasons for the violation

We believe that the procedural inadequacies and implementation problems cited occurred primarily as a result of oversight on the part of the procedure writer and those who reviewed and approved the procedures, and partly because of inadequate communication.

- a. The example of the violation regarding the failure to include a reset step in SP 1303-4.1 occurred because of

an oversight on the part of the procedure writer. Each of the other reset steps were included. However, we did not achieve the level of detail intended without this step. Therefore, we accept this example as cited in the violation.

- b. Several maintenance procedures contain a generic requirement to verify the operability of the redundant string prior to working on components in a safety system. This requirement is accomplished by operations personnel who complete the verification. Redundant string operability verification is controlled by switching and tagging procedure AP 1002, which fully meets the intent of this generic requirement. However, the wording of this step as it refers to a "specific checklist" to verify operability of the redundant string is recognized as inaccurate terminology. The misunderstanding over the procedure step in E-18 that refers to a "specific checklist" resulted because of inadequate communications in that maintenance personnel were not made aware of how the requirements of this step are being met.
- c. The battery charger re-powering incident occurred, in part, because of inadequate communications between the job supervisor and the technician performing the work. The job supervisor had intended the written steps to indicate only that battery charger DC power be applied before AC power. It was not his intention that a different breaker closing sequence to be taken into the field and used in violation of the procedure.

The different breaker closing sequences were technically sound, as acknowledged in IR 90-15, and could have been allowed by the procedure. This misunderstanding would not have resulted in the violation if the procedure (E-18, Rev 9) had allowed the flexibility where appropriate.

### III. Corrective steps which have been taken and the results achieved

SP 1303-4.1 was revised before the next scheduled performance to include the specific bistable resets identified in the notice of violation. This completes the required action to resolve example "a" cited above.

In response to example "c" of the violation, the Plant Materiel Director has re-emphasized adherence to the requirements of AP 1001G when procedure steps cannot be followed in a memorandum dated November 13, 1990 to all maintenance personnel. The memo also re-emphasizes that an

individual who believes a job should be done in some way different from that specified by the procedure should change the procedure prior to performing the work. The memo specifically states that procedural compliance is a requirement.

IV. Corrective steps which will be taken to avoid further violations

E-18 and the other procedures containing the ambiguous reference to a "specific checklist" will be revised as part of the procedure improvement program. Until such time as E-18 is revised to more adequately reflect re-powering requirements, the current procedure operating sequence is technically correct and will continue to be used.

In response to example "b" of the violation, the TMI-1 Maintenance Procedure Writer's Guide addresses the issue of safety system redundant string verification prior to maintenance. As individual procedures go through the improvement process, they are being revised to remove the ambiguity of the reference to a "specific checklist." The intent of this procedure step, along with the changes to improve it, have been documented by a memorandum dated September 19, 1990 and will be discussed with all foremen and crafts personnel. Operations personnel are aware of their responsibilities for verification of redundant string operability and have been performing this function correctly. Therefore, we do not believe that dedicated efforts in addition to the ongoing procedure improvement program are warranted to revise all of the affected procedures.

V. Date of Full Compliance

Although all of the procedures containing the ambiguous step that refers to a "specific checklist" may not be revised until completion of the procedure improvement program, all maintenance personnel will have been instructed regarding the meaning of this step sufficiently to compensate for the ambiguity by January, 1991.