

## **GPU Nuclear Corporation**

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January 10, 1983 5211-83-003

Mr. R. C. Haynes Region 1, 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 50-289/82-22

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.

Sincerely,

D.

Director, TMI-1

HDH:CJS:vjf

Enclosures

cc: Mr. R. Conte

Sworn and Subscribed to before me this <u>10th</u> day of January , 1983.

Notary Public

JULIA E. PARK, Notary Public Middletewn, Deuphin County, Pa. My Commission Expires Nov. 3, 1986

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## ATTACHMENT I

## RESPONSE TO INSPECTION REPORT 50-289/82-22

## NOTICE OF VIOLATION

As a result of the inspection conducted on October 12, 1982 through October 28, 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 20.201(b) requires a licensee to conduct surveys, as defined in Part 20.201(a), to comply with the regulations in Part 20 and, which are reasonable under the circumstances to evaluate the extent of radiation hazards that are present.

Contrary to the above, on October 14, 1982, no survey was conducted to comply with the regulations in Part 20 or, as reasonable under the circumstances, to evaluate the extent of radiation hazard that a bag of trash in a restricted area presented. Specifically, a bag of trash, which was stored in the "B" Once Through Steam Generator lower tent area in excess of 24 hours, was found at a radiation level greater than 300 mR/hr. Neither the most recent radiation survey nor the radiation work permit for this area identified a source of radiation in the area greater than 80 mR/hr.

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

1. Corrective Steps Taken and Results Achieved

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- A. During the 3-11 shift on the date the violation was discovered, the bag of trash in question was surveyed, tagged and moved to a locked radioactive material storage area.
- B. The Radiological Controls Technician identified as being the last to have occupied the lower OTSG tent was counseled on survey requirements, tagging and disposition of radioactive material.
- C. A memo was issued to all Radiological Controls Technicians and Foremen, delineating Radiological Controls responsibilities during coverage of the OTSG repair, including control and disposition of contaminated trash. (Completed 10/31/82)
- D. Radiological Controls and Radwaste developed and published guidance for disposition of radioactive trash generated during the OTSG repair, based on dose rate level of the trash. (See RC-82-795 memo dated December 29, 1982)
- 2. Conjective Steps which will be taken to avoid further violations
  - A. A Radiological Controls procedure is being written to address radioative trash control and will be issued by January 30, 1983.
- 3. Date when full compliance will be achieved
  - A. Full compliance was achieved on 12/29/82.