

APPENDIX A
NOTICE OF VIOLATION

GPU Nuclear Corporation
Three Mile Island, Unit 1

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

As a result of the inspection conducted on November 19 through December 21, 1990, and in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C (Enforcement Policy) (1991), the following violations were identified:

- A. 10 CFR 50.59 requires that for changes in the facility as described in the safety analysis report, a written safety evaluation which provides the bases for the determination that the change, test or experiment does not involve an unreviewed safety question must be prepared.

The licensee's requirements for complying with 10 CFR 50.59 are provided in Procedures EP-016, Revision 4, "Nuclear Safety/Environmental Impact Determination and Evaluation" and 1000-ADM-1291.01, Revision 8, "Safety Review Process".

Section 8.2 of the safety analysis report describes the emergency diesel generator structures and states, "The units are...separately enclosed to minimize the likelihood of mechanical...damage."

Contrary to the above, on or before December 17, 1990, two large maintenance cranes were installed above the emergency diesel generators via EER 87-049-M without any written safety evaluation.

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

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- B. 10 CFR 50, Appendix B, Criterion XI requires that all testing be performed in accordance with written test procedures which incorporate the requirements and acceptance limits contained in applicable design documents.

GPUNC's Quality Assurance Plan for Three Mile Island, Unit 1, No. 1000-PLN-7200.01, Revision 2, Section 6.5.1.1, Test Control, requires that all testing be performed in accordance with written, approved, and controlled test procedures or instructions which incorporate or reference the requirements and acceptance standards contained in the applicable design documents.

Contrary to the above, on December 3, 1990, the acceptance criteria of 83 percent capacity specified in Procedure No. 1303-11.11, "Station Storage Battery Load test", Revision 17, for the 'A' battery was inadequate in that, at 83 percent capacity, one of the battery banks would no longer be able to carry its design loads. The calculated minimum required capacity for the particular battery bank is 87 percent.

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, if applicable, a copy to the NRC Resident Inspector, within thirty days of the date of the letter which transmitted this Notice of Violation (Notice). 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 which will be taken to avoid further violations; and (4) the date when full compliance will be achieved. If an adequate reply is not received within the time specified in this Notice, an order may be issued to show cause why the license should not be modified, suspended, or revoked, or why such other action, as may be proper, should not be taken. Where good cause is shown, consideration will be given to extending this response time. Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.