

DCS

October 24, 1994

Mr. T. Gary Broughton  
Vice President and Director, TMI  
GPU Nuclear Corporation  
Three Mile Island Nuclear Station  
Post Office Box 480  
Middletown, Pennsylvania 17057-0191

SUBJECT: NRC OPERATIONAL SAFETY TEAM INSPECTION, NRC REGION I INSPECTION  
REPORT NO. 50-289/94-80

Dear Mr. Broughton:

This letter transmits the report of the Operational Safety Team Inspection, conducted from August 29 - September 2, 1994, and September 12-16, 1994, at your Three Mile Island Nuclear Station, Unit 1. The inspection was led by Mr. Neil Perry of this office and consisted of staff from Region I. At the conclusion of the inspection, the team findings were discussed with you and members of your staff at an inspection exit meeting on September 16, 1994.

The objective of this inspection was to conduct a performance-based inspection of management programs and processes that support safe operation of the Three Mile Island Nuclear Station. The team focused on inspection activities in the areas of (1) operations, (2) maintenance and surveillance, (3) engineering, and (4) problem resolution. Within these areas, the inspection consisted of selective examinations of procedures, program records, installed equipment, interviews with personnel, and observations by the inspectors.

The Operational Safety Team Inspection concluded that plant processes and programs were being conducted in a safe and controlled manner. Strengths were noted in the engineering area, operator performance in the control room, and maintenance training. The management oversight of plant programs and processes was generally satisfactory. However, the team noted instances where administrative requirements, which prescribe operator performance standards, do not accurately reflect management expectations. Management expectations are higher than administrative requirements, though plant personnel were found to be meeting the administrative requirements. Additionally, it appears that management attention is warranted to ensure that personnel are sensitive to the need to promptly enter deficiencies into the corrective action programs. We request that you review the team's findings, confirm that weaknesses identified by the team are being addressed by your plant management, or other oversight groups' corrective actions, and provide a written response of your assessment within 30 days.

Based on the results of this inspection, one violation associated with the preventive maintenance program was identified by the team. Multiple, scheduled preventive maintenance activities for safety related components were deferred or cancelled without proper technical justification. Although no

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examples were identified that affected operability, this practice is of concern because it had a potential for adversely affecting safety related and safety significant components.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Additionally, we request that you provide a full understanding of the root causes for the deferrals and cancellations without proper technical justification. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter, its enclosures, and your responses will be placed in the NRC Public Document Room. Accordingly, your response should not, to the extent possible, include any personal privacy, proprietary, or safeguards information so that it can be released to the public and placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Pub. L. No. 96.511.

Your cooperation with us in this matter is appreciated.

Sincerely,

**Original Signed By**

Richard W. Cooper II, Director  
Division of Reactor Projects

Docket No. 50-289

Enclosures:

1. Notice of Violation
2. NRC Operational Safety Team Inspection, Inspection Report No. 50-289/94-80

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cc w/encl:

M. J. Ross, Director, Operations and Maintenance  
J. C. Fornicola, Director, Licensing and Regulatory Affairs  
J. S. Wetmore, Manager, TMI Licensing Department  
E. L. Blake, Shaw, Pittman, Potts and Trowbridge (Legal Counsel for GPUN)  
TMI-Alert (TMIA)  
K. Abraham, PAO (2)  
Public Document Room (PDR)  
Local Public Document Room (LPDR)  
Nuclear Safety Information Center (NSIC)  
NRC Resident Inspector  
Commonwealth of Pennsylvania

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bcc w/encl:  
Region I Docket Room (with concurrences)  
J. Rogge, DRP

bcc w/encl (VIA E-MAIL):  
W. Dean, OEDO  
P. McKee, PD I-4, NRR  
R. Hernan, PD I-4, NRR  
M. Shannon, NRR/ILPB

*Durr Revised  
Drafts. Comments  
incorporated*

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DATE	10/17/94	10/18/94	10/18/94	10/24/94

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