

APPENDIX A
NOTICE OF VIOLATION

GPU Nuclear Corporation
Three Mile Island Nuclear Generating Station - Unit 1

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

During an NRC inspection conducted on December 29, 1991 - February 1, 1992, two violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violations are listed below:

- A. 10 CFR 50, Appendix B, Criterion III, requires that measures shall be established to assure that applicable regulatory requirements and design bases are correctly translated into specifications. Measures shall also be established for the selection and review for suitability of application of materials that are essential to the safety-related functions of systems.

The above criterion is implemented by the GPUN Operational Quality Assurance Plan, Rev. 5, step 4.2.3, which states that "the materials, parts, and processes selected by design are reviewed to assure that they are suitable for the intended application, including the compatibility of materials...and quality standards."

The Operational Quality Assurance Plan requirement for ensuring compatibility of materials is implemented by EP-009, "Design Verifications," rev. 4, in the Verification General Checklist, item No. 1.15. This item requires verification of material compatibility.

The Operational Quality Assurance Plan requirement for ensuring proper material quality standards is EP-011, "Methodology for Preparing the Quality Classification List," rev. 4, step 2.1. Step 2.1 states that "The detailed data for each item in the component level Quality Classification List in GMS2 is the basis for the application of the GPUN Operational Quality Assurance Plan." GMS2 listed the pressure boundary of the Intermediate Closed Cooling Water (ICCW) System as nuclear safety related.

Contrary to the above, the licensee failed to assign the correct quality classification and verify material compatibility as evidenced by the following examples:

- a. Safety Evaluation 113202-046, dated February 2, 1990, and Change Modification Request 90-019, dated January 31, 1990, incorrectly classified a change modification to the Intermediate Closed Cooling Water (ICCW) system piping as Regulatory Required vice Nuclear Safety Related.

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- b. Change Modification Request 90-0190, dated February 2, 1990, failed to adequately evaluate the compatibility of a system corrosion inhibitor, NALCO, with newly installed ICCW system piping containing o-rings which were incompatible with NALCO.

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

- B. 10 CFR 50, Appendix B, criterion XVI, requires that measures shall be taken to assure that conditions adverse to quality, such as failures, malfunctions, deficiencies, deviations, defective material and equipment, and nonconformances are promptly identified and corrected.

Drawing No. C-302-661, "Makeup and Purification," shows that the tubing to gauges MU-22-PI-2 and MU-22-PI-3 is within the seismic category I boundary.

Contrary to the above, the licensee failed to promptly correct and restore tubing to gauges MU-22-PI-2 and MU-22-PI-3 to seismic category I requirements. The gauges were changed by January 27, 1990, with the existing mounting hardware unable to attach to the new gauges. No documentation was available showing repair or replacement of the mounting hardware. Further, on January 8, 1992, licensee management became aware of the condition and failed to correct the condition or issue a work request until notified by NRC on January 23, 1992.

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 30 days of the date of the letter transmitting this Notice of Violation. 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 that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending the response time.