

D&D

December 4, 1995

Mr. James Knubel
Vice President and Director, TMI
GPU Nuclear Corporation
Three Mile Island Nuclear Station
Post Office Box 480
Middletown, PA 17057-0191

SUBJECT: NRC INSPECTION REPORT NO. 50-289/95-13 AND NOTICE OF VIOLATION

Dear Mr. Knubel:

This refers to the inspection conducted on September 8, 1995 - November 6, 1995 at the Three Mile Island Nuclear Station Unit 1. The purpose of the inspection was to determine whether activities authorized by the license were conducted safely and in accordance with NRC requirements. At the conclusion of the inspection, the findings were discussed with Mr. Ross and other members of your staff.

Areas examined during the inspection are identified in the report. Within these areas, the inspection consisted of document reviews, personnel interviews and observations of activities important to the health and safety of the public. This report includes findings of resident and region-based inspectors in order to better integrate our inspection findings into a consistent regulatory message and more clearly communicate how these findings may reflect a change in your performance.

Overall, activities associated with the 11R refuel outage were performed in a safe and controlled manner, with appropriate management oversight. Significant improvements, compared to the 10R outage, were noted in the maintenance of proper water inventory when systems were removed from and returned to service and the control of electrical bus outages. Significant emerging problems, such as the fuel degradation and the excessive control rod drop times were appropriately elevated to management and resolved after assessing the impact of the problem and determining long term corrective actions to resolve the issues.

An area of concern was identified regarding the decision making process and operability determination involving a clogged strainer for a decay river pump. Considering the potential generic concern with the other safety related river water pumps, it appears that a more timely approach was warranted to ensure the operability of the non-running pumps. Ultimately, plant engineering highlighted the significance of the issue and a plant review group (PRG) meeting was conducted. The PRG decisions and recommendations were appropriately focused and they developed a good basis for concluding that the other non-running pumps were operable.

You demonstrated overall good performance in implementing your inservice inspection program during the refueling outage. One unresolved item was identified involving your use of a voltage-based criteria for dispositioning eddy current indications in steam generator tubes.

9512140272 951204
PDR ADOCK 05000289
Q PDR

140003

IE01

Mr. James Knubel

2

In the area of plant support, we found that you had an overall effective program for occupational radiation protection during the refueling outage. However, based on the results of this inspection, the NRC has determined that a licensee-identified violation of NRC requirements occurred, regarding the failure to follow radiological control procedures for control of a radiography area. The violation is cited in the enclosed Notice of Violation and the circumstances surrounding it are described in detail in the subject inspection report. The violation is being cited because the immediate and long-term corrective actions were not sufficiently comprehensive to assure effectiveness in preventing recurrence of this type of event. We consider that the problem identification and correction process was inadequate, in this instance, because: (1) the shift supervisor or other responsible licensee management was not provided an opportunity to exercise management oversight and review of the occurrence prior to the resumption of radiography operations, and (2) originally determined long-term corrective actions were limited only to review the use of postings for possible improvements.

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, including actions to prevent similar occurrences with adherence to radiological controls procedures. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. 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 response will be placed in the NRC Public Document Room (PDR). To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

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.

Sincerely,

Original Signed By:

Peter W. Eselgroth, Chief
Projects Branch No. 7
Division of Reactor Projects

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

Enclosures:

1. Notice of Violation.
2. NRC Inspection Report No. 50-289/95-13

Mr. James Knubel

3

cc w/encl:

E. L. Blake, Shaw, Pittman, Potts and Trowbridge (Legal Counsel for GPUN)
Commonwealth of Pennsylvania

J. C. Fornicola, Director, Licensing and Regulatory Affairs

M. J. Ross, Director, Operations and Maintenance

TMI-Alert (TMIA)

J. S. Wetmore, Manager, TMI Licensing Department

Mr. James Knubel

4

Distribution w/encl:

Region I Docket Room (with concurrences)
P. Eselgroth, DRP
D. Haverkamp, DRP
NRC Resident Inspector
Nuclear Safety Information Center (NSIC)
PUBLIC
D. Screnci, PAO (2)

Distribution w/encl (VIA E-MAIL):

W. Dean, OEDO
R. Hernan, PD I-4, NRR
P. McKee, PD I-4, NRR
Inspection Program Branch, NRR (IPAS)

DOCUMENT NAME: G:\BRANCH7\TMI9513.INS

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	RI/DRP <i>DRP</i>	RI/DRP	/	/
NAME	<i>MEvans</i>	PEselgroth		
DATE	<i>12/4/95</i>			

OFFICIAL RECORD COPY