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May 4, 1992
C311-92-2065

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
response to the Notice of Violation in Inspection Report 92-01

Enclosed is the GPU Nuclear reply to the Notice of Violation transmitted as
Appendix A to Inspection Report 92-01.

Sincerely,

T. G. Broughton
Vice President and Director, TMI-1

MRK

Attachment

cc: Region I Administrator, NRC
Senior Project Manager, TMI-1, NRC
Senior Resident Inspector, TMI-1, NRC

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PDR ADOCK 05000289
G PDR

TEO 1

METROPOLITAN EDISON COMPANY
JERSEY CENTRAL POWER AND LIGHT COMPANY
PENNSYLVANIA ELECTRIC COMPANY
GENERAL PUBLIC UTILITIES NUCLEAR CORPORATION

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289

Response to the Notice of Violation
in Inspection Report 92-01

This letter is submitted in response to the Notice of Violation presented in Inspection Report 92-01. All statements contained in this response have been reviewed, and all such statements made and matter set forth therein are true and correct to the best of my knowledge.

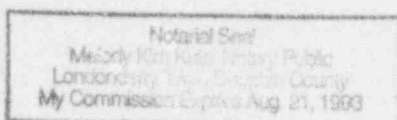
T. G. Broughton

T. G. Broughton
Vice President and Director, TMI-1

Signed and sworn before me this

5th day of MAY, 1992.

Melody Kim Kulp



Member, Pennsylvania Association of Notaries

Notice of Violation

Technical Specification 6.8.1 requires that written procedures be established, implemented and maintained for the applicable procedures recommended in Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978.

Appendix "A" of Regulatory Guide 1.33, Revision 2, February 1978, step 9.a, states that maintenance that can affect the performance of safety-related equipment should be properly pre-planned and performed in accordance with written procedures.

Corrective Maintenance Procedure 1440-Y-3, rev. 8, "Scaffolding Construction/Inspection," step 8.16, requires that the Operations Department sign the scaffold inspection tag to verify that the scaffold will not endanger ESAS equipment or operation.

Contrary to the above, on February 6, 1992, the inspector noted that scaffolding in the spent fuel pool cooler area had been installed since January 17, 1992, and had not received its Operations Department inspection.

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

GPU Nuclear Response to the Notice of Violation

The Notice of Violation addresses a condition noted on February 6, 1992 concerning scaffolding installed in the spent fuel pool cooler area. Specifically, the Operations Department had not signed the scaffold inspection tag, as required by Corrective Maintenance Procedure 1440-Y-3, Rev. 8, verifying that the scaffolding was properly installed and located such that it did not endanger Engineered Safeguards Systems or interfere with other operating requirements.

In responding to the Notice of Violation, the Inspection Report requests that GPU Nuclear discuss the actions taken to address the repetitive nature of the problem citing four (4) other examples of deficient scaffolding activities. GPU Nuclear agrees with the cited violation, as stated. GPU Nuclear also acknowledges that repetitive deficiencies did occur in that multiple incidents were noted which resulted from a breakdown in the controls and processes established for the proper use of scaffolding at TMI-1. Although unrelated and mostly dissimilar, these incidents may indicate an occasional weakness in management controls to ensure scaffolding is properly installed, inspected, and promptly removed at TMI-1. However, they represent a very small percentage of the overall scaffolding activities performed during the period. It is noteworthy that each of the cited examples in the report appears to be an isolated event and, in the context of the overall program, a matter of individual supervisory oversight rather than representing a serious programmatic or management deficiency. Also, we believe that the scaffolding installation cited in the Notice of Violation was properly installed and did not interfere with Engineered Safeguards Systems even though the required inspections were not properly documented as required.

GPU Nuclear Response to the Notice of Violation (Contd.)

I. Reasons for the violation

GPU Nuclear believes that adequate procedural controls are in place to control the use of scaffolding at TMI-1. However, in the case of the cited incident, the established controls and processes were not adhered to. On completion of a scaffolding installation, the Operations Department is requested to perform an inspection in accordance with Corrective Maintenance Procedure 1440-Y-3. The inspection may not be performed immediately upon notification depending upon their priorities in operating the plant safely. Without knowing the complete details regarding the cited scaffolding incident, it appears that:

1) Operations did not follow up and perform the required inspection if they were properly notified, 2) Personnel who used this scaffolding installation did so without the proper inspections prior to use as required by the procedure, and 3) The installation was not terminated and removed after use.

II. Corrective steps which have been taken and the results achieved

The condition involving scaffolding installed in the spent fuel cooling area was corrected the same day that the situation was pointed out by the NRC inspector.

To discover and correct any discrepancies that exist, daily checks have been added to the Auxiliary Operator (AO) Log sheets (Primary, Secondary, and Outbuilding Logs) effective March 13, 1992. These checks are to ensure that any scaffolding encountered during rounds has a proper construction inspection tag including a final review signature by Operations and that the scaffolding does not hinder operation or access to components paying particular attention to safety related components.

III. Corrective steps which will be taken to avoid further violations

TMI-1 personnel responsible for control and use of scaffolding (Operations, maintenance, and construction management) will be instructed in the need for adherence to proper use and control of scaffolding. This includes the second shift foreman, where assigned to operating shifts, who will have as one of his responsibilities to review compliance with administrative programs including scaffolding. GPU Nuclear believes the actions taken and those planned will be sufficient to avoid further violations.

IV. Date of Full Compliance

GPU Nuclear considers that full compliance has been achieved.