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 Writer's Direct Dial Number:

August 24, 1984  
 5211-84-2211

Dr. Thomas E. Murley  
 Region I, Regional Administrator  
 U. S. Nuclear Regulatory Commission  
 631 Park Avenue  
 King of Prussia, PA 19406

Dear Dr. Murley:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
 Operating License No. DPR-50  
 Docket No. 50-289  
 Notice of Violation for Inspection 84-06

Attached to this letter is the GPUN response to Appendix A of Inspection Report 50-289/84-06, "Notice of Violation." This letter is being submitted late as discussed with R. Conte, NRC.

Sincerely,

*H. D. Hukill*  
 H. D. Hukill  
 Director, TMI-1

HDH:CWS:vjf

Enclosure

cc: R. Conte

Sworn and Subscribed to  
 Before me this 24th day  
 of August, 1984.

*Dana J. Baum*  
 Notary Public

8409050246 840824  
 PDR ADOCK 05000289  
 G PDR

MIDDLETOWN, PENN. DAUPHIN COUNTY  
 MY COMMISSION EXPIRES JUNE 17, 1985  
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## NOTICE OF VIOLATION

As a result of the inspection conducted on February 12, 1984 to April 12, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), the following violation was identified:

10 CFR 50, Appendix B, Criterion XV requires that ". . . Non-conforming items shall be reviewed and accepted, rejected, repaired or reworked in accordance with documented procedures."

Section 8.3.5 of licensee QA Procedure No. TMI-15-03 Revision 1, states in part, that: "the cognizant engineer will perform an evaluation of the nonconformances, proposed dispositions . . . For all MNCR's the appropriate disposition category shall be checked and the technical justification stated for Repair or Use-As-Is disposition."\*

Section 2.4 of the Design Control Procedure No. 2.05 for Field Change Requests and Design Verification Records (DVR) states, in part, that: "Verification shall be recorded on the DVR form GA1-468 (attachment 1). This attachment requires that the verification package include documents to be verified, supporting documents, extent of verification and results of verification.

Contrary to the above, on March 9, 1984, the inspector noted that the licensee was not documenting the technical justification for Use-As-Is disposition of deviations/nonconformances identified in Field Change Request C-005021.

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\*Note: The original notice of violation reference "section 4.5.1 of licensee procedure No. EMP-015". This reference was later revised as above through discussions with the resident inspector.

## RESPONSE TO NOTICE OF VIOLATION

### I. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

A GPUN evaluation of the design verification documentation process was performed. It indicated that the technical adequacy of the disposition in question was not adversely impacted by the apparent lack of justification for that disposition. Typically, additional calculations or analyses are not required to justify the impact of minor variances from the original design which are determined to be within the original design bases.

For design verification of Field Change Request No. 005021 (FCR-005021) the Piping Department at Gilbert Associates Inc. (GAI) had utilized a departmental form in place of Design Verification Record (DVR) form GAI-468. This was corrected through direction from GPUN to the GAI Project Management Staff.

This was found to be an isolated occurrence, limited to the GAI Piping Department.

### II. CORRECTIVE STEPS TAKEN TO AVOID FURTHER VIOLATION

A GPUN directed joint GPUN/GAI/QA audit was performed on March 14, 1984 to determine if other discrepancies existed. Based on review of various design verification records, the audit concluded that sufficient documented analyses/calculations were in the design files, to justify approvals of design changes. The documentation levels were found to be adequate in accordance with the written GPUN and GAI procedures. Additional calculations/analyses required for design verification of changes from the original design are performed, if required.

GAI Project Management also provided corrective measures to ensure that all GAI departments supporting TMI-1 were using the required forms as discussed above.

We believe these actions provide acceptable and auditable verification documentation for the design changes for all Field Change Requests.

### III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance has been achieved for the adequacy of disposition justification for FCR-005021 as identified in this response.

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RECEIVED - GAI