

**GPU Nuclear Corporation** 

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December 5, 1984 5211-84-2290

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 I (TMI-1) Operating License No. DPR-50 Docket No. 50-289 Notice of Violation for Inspection 84-24

Attached to this letter is the GPUN response to Appendix A of Inspection Report 50-289/84-24, "Notice of Violation".

Sincerely,

Director, TMI-1

HDH/SMO/kds

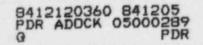
Enclosure

cc: R. Conte

Sworn and Subscribed to Before me this <u>Bran</u> day of <u>because</u>, 1984.

Dares your Bar Notary Public

DARLA JEAN STRRY, RUMAN PUBLIC MIDDLETOWN BURD, DAUPHIN COUNTY MY COMMISSION EXPIRES JUNE 17, 1985 Member, Pennsylvania Association of Notaries



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#### NOTICE OF VIOLATION

As a result of the NRC inspection conducted on August 3 - September 7, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C, published by Federal Register Notice 49 FR 8583, dated March 8, 1984), the following violation was identified.

Technical Specifications (TS) 6.5.1.1, 6.8.1, and 6.8.2, require, in part, that important to safety maintenance procedure changes be reviewed for adequacy as specified in ANSI N18.7, 1976, Administrative Controls and Quality Assurance (QA) for the Operational Phase of Nuclear Power Plant (committed to by the licensee in the licensee's NRC approved QA Plan).

Contrary to the above, an Important To Safety Maintenance Procedure 1407-1, Unit 1 General Corrective Maintenance, Revision 16, dated August 23, 1984, which implemented the current minor maintenance work form, was not properly reviewed for adequacy. Specifically, for minor maintenance, the work form was not adequate in that it does not provide for documented release of important to safety system equipment to maintenance by the operations department (ANSI N18.7, paragraph 5.2.6); does not provide for traceability of materials/parts (ANSI N18.7, paragraph 5.2.13.3); does not provide for documenting the use of maintenance procedures (ANSI N18.7, paragraph 5.2.7 and 5.2.12); and does not provide for specifying a post maintenance test procedure including test acceptance criteria that is preplanned (ANSI N18.7, paragraph 5.2.19.3).

### RESPONSE TO NOTICE OF VIOLATION

## I. CORRECTIVE STEPS TAKEN AND RESULTS ACHIEVED

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Maintenance Procedure 1407-1, Unit 1 General Corrective Maintenance, Rev. 16 has been reviewed and the inadequacies identified have been acknowledged.

### II. CORRECTIVE STEPS WHICH WILL BE TAKEN TO AVOID FURTHER VIOLATIONS

Maintenance Procedure 1407-1 will be revised to address the items identified in the notice of violation.

# III. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The revised procedure will be approved and implemented by February 1, 1985.