

APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation
Three Mile Island Unit 2

Docket No. 50-320
License No. DPR-73

As a result of the Performance Appraisal Inspection conducted February 27 - March 9 and March 19 - 23, 1984, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (49 FR 8583) the following violations were identified:

- A. 10 CFR 50.59(a)(1) allows licensees to make changes to the facility as described in the Safety Analysis Report without prior Commission approval, provided the changes do not involve an unreviewed safety question. 10 CFR 50.59(b) further requires that licensees maintain records of changes made pursuant to 10 CFR 50.59, including written safety evaluations providing the bases for the determination that the changes do not involve unreviewed safety questions.

Contrary to the above, the licensee has continuously made temporary modifications pursuant to Procedure 4000-ADM-3020.08, Revision 0, Configuration Control: Safety Function Bypass, Electrical Jumper, Lifted Lead, and Temporary Modifications, without determining whether the modifications were changes to the facility as described in the Safety Analysis Report or involved unreviewed safety questions. These temporary modifications involve those systems and components which are not listed on the Quality Classification List (QCL) that may have an impact on safety. Furthermore, records maintained pursuant to 4000-ADM-3020.08 of some changes to systems or components listed on the QCL and evaluated per 10 CFR 50.59 lacked written safety evaluations supporting the determination that the changes did not involve unreviewed safety questions.

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

- B. The GPU Nuclear Recovery Quality Assurance Plan for TMI Unit 2, Revision 2, January 19, 1983, Section 6.8.1.2, requires procedures for identification of the operating status of systems, components, controls, or support equipment in order to prevent inadvertent or unauthorized operation. The procedures shall require control measures such as locking or tagging and shall require independent verification where appropriate to ensure that necessary measures have been implemented correctly.

Contrary to the above, Section 6.8.1.2 of the GPU Nuclear Recovery Quality Assurance Plan was not implemented in the following cases:

- Procedure 4000-ADM-3020.04, Switching and Tagging Safety, Revision 0, prescribed control measures for equipment tagging, but did not require independent verification of tagging in all appropriate cases

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- Procedure 4000-ADM-3020.08, Controlled Key Locker, Revision 0, prescribed the control measures for locking of valves, but did not require independent verification of valve position or installation of locking devices.

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

- C. Section 6.1.2 and Appendix C of the GPU Nuclear Recovery Quality Assurance Plan requires the implementation of the requirements of Regulatory Guide 1.33, Revision 2, 1978, and ANSI N18.7-1976, in procedures governing station activities. Section 5.3.5 of ANSI N18.7-1976, as endorsed by Regulatory Guide 1.33, requires that where vendors manuals or drawings provide adequate instructions to assure the required quality of work, the applicable sections of the manuals or drawings shall be referenced in the procedure, or may constitute adequate procedures in themselves. Such procedures shall receive the same level of review and approval as operating procedures.

Contrary to the above, Unit Work Instruction 4220-3680-84-D-55, completed January 19, 1984, authorized the repair or replacement of the FS-P-1 battery or battery charger using procedure 1420-Y-13, Troubleshoot and Repair of Control or Indication Circuits, Revision 2. Procedure 1420-Y-13 directed the worker to "obtain any applicable vendor's manuals." The specific manuals and/or specific sections of the manuals were not referenced nor were the manuals reviewed and approved.

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

- D. Technical Specification 6.8.1 requires that the procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978, be implemented. Appendix A of Regulatory Guide 1.33, Revision 2, 1978, recommends procedures for control of measuring and test equipment. Procedure 4000-ADM-3061.02, Control of Measuring and Test Equipment, Revision 0, requires that when a piece of measuring and test equipment is found to be out of calibration that the Cognizant Engineer generate a Material Non-Conformance Report (MNCR) and provide corrective action. It further requires that the corrective action include a documented evaluation to determine if any retesting of systems or components is required as a result of the test equipment being out of calibration.

Contrary to the above, MNCR's were not issued when measuring and test equipment was found to be out of calibration. Further, components of the Radiation Monitoring System Test Rig Model TM 506, serial B012043, were found out of calibration on January 25, 1984 and as of March 15, 1984, only 4 of 22 tests using the rig since its previous calibration had been evaluated to determine the need for retesting.

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 to this office within 30 days of the date of this Notice, a written statement or explanation in reply including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved. Where good cause is shown, consideration will be given to extending your response time.