

January 6, 1997

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

SUBJECT: INSPECTION REPORT NO. 50-289/96-07

Dear Mr. Knubel:

This letter refers to your December 24, 1996 correspondence, in response to our December 6, 1996 letter.

Thank you for informing us of the corrective and preventive actions documented in your letter. These actions will be examined during a future inspection of your licensed program.

Your cooperation with us is appreciated.

Sincerely,

Original Signed By:

Peter W. Eselgroth, Chief
Projects Branch 7
Division of Reactor Projects

Docket No. 50-289

cc: w/o cy of Licensee's Response Letter
J. C. Fornicola, Director, Licensing and Regulatory Affairs
M. J. Ross, Director, Operations and Maintenance
J. S. Wetmore, Manager, TMI Licensing Department

cc: w/cy of Licensee's Response Letter
TMI-Alert (TMIA)
E. L. Blake, Shaw, Pittman, Potts and Trowbridge (Legal Counsel for GPUN)
Commonwealth of Pennsylvania

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Distribution w/cy of Licensee Response Letter

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(717) 948-8005

December 24, 1996
6710-96-2420

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

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Response to Notice of Violation (NOV) 96-07-01

Enclosed is the GPU Nuclear response to Notice of Violation 96-07-01 which cited GPU Nuclear for the failure to comply with the scaffold construction procedure which is considered a violation of TMI-1 Technical Specification 6.8.1.a. Please contact J. Schork, TMI Licensing at (717) 948-8832 should you have any questions regarding this response.

Sincerely,

J. Knubel
Vice President and Director, TMI

JSS

Enclosures: 1) Notice of Violation 96-07-01
2) Response to Notice of Violation 96-07-01

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

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NOTICE OF VIOLATION

GPU Nuclear Corporation
Three Mile Island Nuclear Station, Unit 1 *

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

During an NRC inspection, conducted September 29, 1996 - November 18, 1996, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG 1600, the violation is listed below:

Technical Specification (TS) 6.8.1 states, in part, that "Written procedures shall be implemented covering the items referenced in Appendix `A' of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix `A', section 9.0 references "Procedures for Performing Maintenance," that can affect the performance of safety related equipment. Specifically, corrective maintenance procedure 1440-Y-3, "Scaffold Construction/Inspection and Use of Extension Ladders," section 5.8 states, in part, that "scaffolding shall not be tied off or supported by pipe hangers or pipe supports without prior engineering evaluation and approval." In addition section 8.14.2 states, in part, that "if scaffold is constructed inside the protected areas of the plant, have operations department sign the scaffold inspection tag verifying that the scaffold will not endanger emergency safeguard system equipment or operation."

Contrary to the above,

1. On September 29, 1996, a scaffold was tied-off and supported by a safety related pipe support for the nuclear river water system without prior engineering evaluation and approval.
2. On November 5, 1996, a scaffold was used to lift the motor off of valve MU-V-14A, inside the protected area, before the operations department reviewed and approved that the scaffold's final installation would not endanger emergency safeguards equipment.

This is a Severity Level IV violation (Supplement IV).

Enclosure 1
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Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit a written statement or explanation to the U. S. Nuclear Regulatory Commission, ATTN: Document Control Desk, Washington, D.C. 20555 with a copy to the Regional Administrator, Region I, and a copy to the NRC Resident Inspector at the Facility that is the subject of this Notice, within 30 days of the date of the letter transmitting this Notice of Violation (Notice). This reply should be clearly marked as a "Reply to a Notice of Violation" and should include: (1) the reason for the violation, or, if contested, the basis for disputing the violation, (2) the corrective steps that have been taken and the results achieved, (3) the corrective steps that will be taken to avoid further violations, and (4) the date when full compliance will be achieved. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. If an adequate reply is not received within the time specified in this Notice, an order or a Demand for Information may be issued as to why the license should not be modified, suspended, or revoked, or why such other action as may be proper should not be taken. Where good cause is shown, consideration will be given to extending the response time.

Because your response will be placed in the NRC Public Document Room (PDR), to the extent possible, it should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without reaction. However, if you find it necessary to include such information, you should clearly indicate the specific information that you desire not to be placed in the PDR, and provide the legal basis to support your request for withholding the information from the public.

Dated at King of Prussia, Pennsylvania
this 6th day of December, 1996

GPU Nuclear Response to the Notice of Violation

GPU Nuclear agrees the violation occurred as stated in the notice of violation.

I. Reason for the Violation

The violation occurred because workers did not fully carry out their assigned responsibilities in accordance with Maintenance Procedure 1440-Y-3 Scaffold Construction/Inspection and Use of Extension Ladders.

In the September 29, 1996 event, scaffold erection workers apparently did not recognize that the pipe support to which the scaffold was secured was a safety-related pipe support. The prohibition against attaching a scaffold to safety-related components without an engineering evaluation is clearly addressed in 1440-Y-3. In addition, maintenance scaffold erection personnel are given initial and continuing training on the requirements for scaffold erection and use. Nonetheless, the scaffold was erected and attached to a safety-related pipe support. In addition, the Operations inspection of the scaffold failed to identify that the scaffold was attached to a safety-related pipe support.

The root cause of the September 29, 1996 event was lack of attention to detail on the part of the workers who erected the scaffold and the Operations personnel who inspected the scaffold. Specifically, neither the erection crew nor the Operations inspector identified that the scaffold was secured to a safety-related pipe support.

In the November 5, 1996 event, Utility workers erected a scaffold on November 1, 1996 in support of planned maintenance for MU-V-14A, attached a scaffold inspection tag to the scaffold and then called Plant Operations to get the scaffold inspected. Plant Operations inspected the scaffold and determined that the scaffold required modification prior to use. Plant Operations was concerned because a portion of the scaffold was in close proximity to compressed air lines. Plant Operations informed the on-shift maintenance foreman of the need to have the scaffold modified. The on-shift maintenance foreman decided to have the scaffold modified by the next day shift crew. Despite not being approved for use, the scaffold inspection tag remained attached to the scaffold.

On November 5, 1996, Electrical maintenance workers arrived at the scaffold in order to remove the motor of MU-V-14A. The workers saw the scaffold had an erection tag but they failed to observe that the scaffold had not been approved by Operations. The crew used the scaffold to remove the motor for MU-V-14A.

The root cause of the use of the MU-V-14A scaffold prior to approval for use by Plant Operations was the lack of attention to detail on the part of the Electrical maintenance crew. Specifically, the crew failed to adequately review the scaffold inspection tag prior to using the scaffold.

II. Corrective Steps That Have Been Taken and the Results Achieved

The scaffold that had been attached to a safety-related pipe support was detached from that pipe support the same day that the discrepancy was identified by the NRC. The scaffold over MU-V-14A was inspected by Operations and approved for use the same day that the lack of an Operations approval signature was identified.

III. Corrective Steps That Will be Taken to Avoid Further Violations

Utility and Electrical Maintenance supervision has reviewed each scaffold problem in shop meetings with Utility and Electrical maintenance workers. The procedure requirements were reviewed and the need to comply with procedures in all aspects was emphasized. In addition, these events will be incorporated into the next continuing maintenance training cycle on scaffolding as a lessons-learned topic.

The September 29, 1996 event will be discussed with all Operations Shift Foremen and Shift Supervisors. The need to ensure that scaffolds are not secured to safety-related equipment unless there is an engineering evaluation will be emphasized. In addition, this event will be reviewed for possible inclusion into the lessons-learned portion of operator requalification training.

IV. Date of Full Compliance

Full compliance with the requirements of 1440-Y-3 was achieved with the correction of the violating scaffold conditions.