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April 22, 1988
 C311-88-2051

Mr. William T. Russell
 Region I, Regional Administrator
 US Nuclear Regulatory Commission
 475 Allendale Road
 King of Prussia, PA 19406

Dear Mr. Russell:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)
 Operating License No. DPR-50
 Docket 50-289
 Response to Notice of Violation in
 Inspection Report No. 88-01

Enclosed is GPUN's response to the Notice of Violation in Appendix A to
 Inspection Report No. 88-01.

The first sentence in the Notice of Violation states that two violations of
 NRC requirements were identified. The remaining portion of the Notice of
 Violation discusses one violation. This discrepancy was discussed with the
 Resident Inspector who confirmed that one violation was issued.

This response is being submitted late as discussed with R. Conte, Senior
 Resident Inspector.

Sincerely,

H. D. Hukill
 H. D. Hukill
 Vice President & Director, TMI-1

HDH/SMO/spb:1156A

Attachment

cc: R. Conte, USNRC
 R. Hernan, USNRC
 Document Control Desk, USNRC

Sworn and subscribed to
 before me this 22nd day
 of April, 1988.

WILSON P. BROWN, Notary Public
 MIDDLETON TOWNSHIP, BERKSHIRE COUNTY
 BY COMMISSION EXPIRES JUNE 12, 1988
 Member, Pennsylvania Association of Notaries

Wilson P. Brown
 Notary Public

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Response to Notice of Violation

Each of the items identified will be addressed separately due to specific corrective actions that apply to each. The topic of maintenance planning as it applies to all five items will be discussed at the end of the response.

Item 1

Job Ticket JT-CK-212 for reactor building emergency cooling pump RR-P1B did not specify the correct model for a replacement-in-kind expansion joint. The joint installed when the job was performed between September 8, 1987 and January 13, 1988 was a model with a lower rating than was specified by the design.

GPUN Response 1

Maintenance procedure 1410-Y-36 "Installation of Expansion Joints" will be revised to provide descriptive information and/or illustrations to differentiate between the various expansion joints for which this procedure was intended. Also, a statement will be added which will aid the user in ensuring that the correct replacement part has been provided and selected. The changes will be complete by May 15, 1988. ✓

PCR - in progress

On January 13, 1988, the correct model expansion joint was installed in RR-P-1B. ✓

This event was analyzed as part of the Human Performance Evaluation System. A copy of the report was given to the Senior Resident Inspector. A ✓

Item 2

JT No. CK-211 for the "A" reactor building emergency cooling pump (RR-P1A), performed between June 17, 1987 and January 22, 1988, did not specify the correct model for the installed expansion joint. ✓

GPUN Response 2

No specific corrective action was taken since the correct model was installed. Corrective actions due to maintenance planning deficiencies are discussed later. ✓

Item 3

JT No. CK-211 for RR-P1A, performed between June 17, 1987 and January 15, 1988, had an incorrect torquing maintenance procedure (1410-Y-72), which resulted in overtorquing the bolts for the subject expansion joint. ✓

suppl

GPUN Response 3

Although the job package contained procedure 1410-Y-72, the procedure was recognized to be inappropriate for the job and was not used, therefore, the bolts were not overtorqued. The torquing of the bolts was verified to be correct using the correct procedure, 1410-Y-36, which does not specify a torque value, but specifies that bolts are tightened to the point where there is no leakage at operational pressures.

Item 4

JT No. CP-603, "Cleanup of the Station Battery Terminals," was being performed on January 14, 1988 without the job package at the worksite (Control Building 322-foot elevation). The job package contained an incorrect procedure (1420-EL-1) and a procedure (E-72) that had changes that were not properly reviewed and approved.

✓ GPUN Response 4

The job was performed by the Electrical Maintenance department.

The procedure change to procedure E-72 "Station Batteries Terminal Connection Inspection" that was pending at the time of this Inspection Report has been issued.

A memo was issued to Electrical Maintenance personnel describing the deficiencies noted in this item and reminding personnel of the need to have job packages at worksites and to check for appropriate and approved procedures.

To assure quality work in accordance with procedures, managers and supervisors are increasing their involvement in the work performed at the worksite. This should preclude practices such as not having job packages at the worksite.

Item 5

JT No. CP-727, Repair on the Liquid Waste Transfer Pump (WDL-P7B) was being accomplished on January 29, 1988 without the job package at the worksite (281-foot elevation). The job package had four work procedures that were not controlled copies as required.

✓ GPUN Response 5

This job was performed by the Mechanical Maintenance department.

A memo was issued to Mechanical Maintenance personnel describing the deficiencies noted in this item and reminding personnel of the need to have job packages at worksites and to check for appropriate and approved procedures.

To assure quality work in accordance with procedures, managers and supervisors are increasing their involvement in the work performed at the worksite. This should preclude practices such as not having job packages at the worksite.

GPUN Discussion on Maintenance Planning

GPUN recognizes that deficiencies in maintenance planning contributed to the occurrence of the events identified in the Notice of Violation. The organization that was in place at the time that the activities were performed differs greatly from the organization that presently exists.

Features and practices of the new Plant Materiel organization should help prevent recurrence of the violation. Planning is no longer a concurrent activity for the maintenance organization. A separate Planning and Scheduling department has been created. Additional planners are now in place to perform separate short and long term planning functions. This will result in more thorough planning.

Currently, job tickets are reviewed by planners for completeness and to assure appropriate procedures are specified, although not all jobs are planned by Plant Materiel planners. It is our goal to have all jobs planned by the planning organization by the end of 1988. The achievement of this goal is tied to the completion of the development of a computerized job ticket system.

A work planning form (a checklist) is presently used for major work items. The use of the form will be expanded to include all work affecting the safe and reliable operation of the plant by July 1988. We plan to enhance the form by adding more detailed information when the form is adapted to the new computerized system. *by end of 1988*

Internal now -

The increased staffing and control over job planning, along with the expansion of the use of the work planning form, and the enhancement of the form, should prevent recurrence of the deficiencies in job packages identified in this violation.

Conclusion

Full compliance has been achieved for the specific items in the violation. Actions to prevent recurrence will be completed as discussed above.