ENCLOSURE

NOTICE OF VIOLATION

GPU Nuclear Corporation Three Mile Island Nuclear Station Docket No. 50-289 License No. DPR-50 EA 97-533

During an NRC inspection conducted between September 7 and November 1, 1997, violations of NRC requirements were identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," NUREG-1600, the violations are listed below:

I. VIOLATION ASSOCIATED WITH INOPERABLE PORV

Technical Specification 4.2.2 requires that in service testing (IST) of ASME Code Class 1, Class 2, and Class 3 valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code (ASME Code). The ASME Code and OMa-1988, Part 10, paragraph 3.4, requires that, when a valve or its control system has been replaced, an in-service test must be performed prior to returning the valve to service.

Contrary to the above, on October 31, 1995, the pressurizer power operated relief valve (PORV), a Class 1 valve, was returned to service without performing an IST to verify proper valve operation after the PORV was replaced. As a result, a wiring error, that prevented the PORV from opening in response to an automatic or manual signal, was not detected. Consequently, the PORV was inoperable for the operating cycle from October, 1995, until September, 1997. (01013)

This is a Severity Level III violation (Supplement I).

II. VIOLATION ASSOCIATED WITH RCS OVERFILL

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Technical Specification (TS) 6.8.1 requires, in part, that Written procedures be implemented covering the applicable procedures recommended in Appendix 'A' of Regulatory Guide 1.33, Revision 2, February 1978. Regulatory Guide 1.33, Appendix 'A', section 3.0 recommends, in part, instructions for filling and venting the reactor coolant system (RCS) and for operation of decay heat removal systems.

Operating procedure (OP) 1103-2, "Fill and Vent of the Reactor Coolant System," section 3.1.2, step 17.c, requires, in part, that when the level at the center control rod drive mechanism (CRDM) is observed at one to two feet below the top, terminate the RCS fill and hold level.

CP 1104-4, "Decay Heat Removal System," section II of Enclosure 2, "Make Up to the RCS Directly from the BWST," provides a caution that make up to the RCS directly from the borated water storage tank (BWST) must be carefully monitored since large

Enclosure

volumes of water can be transferred very rapidly. Step 1 of section II states, in part, that controlling the level in the RCS using this method is not considered to be, nor should it be, used as a major RCS fill and vent method.

Contrary to the above, on October 15, 1997, the licensee failed to properly implement operating procedures 1103-2 and 1104-4 while filling and venting the RCS following a refueling outage. Specifically, while filling the RCS from the reactor coolant bleed tank (RCBT) in accordance with OP 1103-2, make up to the RCS was established directly from the BWST, contrary to the instructions in Enclosure 2 of OP 1104-4. The additional makeup caused a prompt rise in pressurizer level. Even though the operators observed the level increase in the control room and terminated the RCS fill from the RCBT, the makeup from the BWST was not immediately terminated due to communications difficulties. Consequently, approximately 50 gallons of RCS water overflowed out of the CRDM vents onto the reactor vessel head area. (02014)

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

III. VIOLATION ASSOCIATED WITH HOT PARTICLE CONTAMINATION

Technical Specification 6.11, Radiation Protection Program, requires that procedures for personnel radiation protection shall be prepared consistent with the requirements of 10 CFR 20 and shall be approved, maintained, and adhered to for all operations involving personnel radiation exposure.

10 CFR 20.1501 requires that each licensee shall make or cause to be made, surveys that may be necessary for the hoensee to comply with the regulations in 10 CFR 20 and are reasonable under the circumstances to evaluate the extent of radiation ievels, concentrations or quantities of radioactive material, and the potential radiological hazards that could be present.

Contrary to the above, as of October 4, 1997, the licensee's hot particle control procedure, Procedure 6610-ADM-4110.04, was inconsistent with 10 CFR 20.1501, in that it did not cause surveys to be made to assure compliance with 10 CFR 20.1201(a)(2)(ii), which limits radiation exposure to the skin. Specifically, the procedure did not provide sufficient direction to assure that surveys to verify elimination of hot particles following decontamination of newly exposed surfaces upon raising the reactor vessel seal plate, were adequate to evaluate the potential radiation hazards. As a result, the hot particles were not sufficiently removed such that the area did not require hot particle controls, nor were hot particle controls established. Consequently, due to a hot particle, a radiation worker received a skin exposure of approximately 14 rem, 30% of the 10 CFR 20.1201 annual limit of 50 rem. (03014)

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

Enclosure

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 for each violation: (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.

Under the authority of Section 182 of the Act, 42 U.S.C. 2232, this response shall be submitted under oath or affirmation.

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 safe guards information so that it can be placed in the PDR without redaction. If personal privacy or proprietary information is necessary to provide an acceptable response, then please provide a bracketed copy of your response that identifies the information that should be protected and a redacted copy of your response that deletes such information. If you request withholding of such material, you <u>must</u> specifically identify the portions of your response that you seek to have withheld and provide in detail the bases for your claim of withholding (e.g., explain why the disclosure of information will create an unwarranted invasion of personal privacy or provide the information required by 10 CFR 2.790(b) to support a request for withholding confidential commercial or financial information). If safeguards information is necessary to provide an acceptable response, please provide the level of protection described in 10 CFR 73.21.

Dated at King of Prussia, Pennsylvania this 27th day of January 1998