

December 2, 1997

EA No. 97-533

Mr. James Langenbach
Vice President and Director, TMI
GPU Nuclear Corporation
Three Mile Island Nuclear Station
Post Office Box 480
Middletown, PA 17057-0191

SUBJECT: NRC INTEGRATED INSPECTION REPORT NO. 50-289/97-09

Dear Mr. Langenbach:

This letter refers to the NRC inspections conducted between September 7 and November 1, 1997, at your Three Mile Island 1 reactor facility. The inspections focused on nuclear safety during the conduct and completion of the 12th refueling outage, in the areas of operation, maintenance, engineering and plant support. The inspectors included resident and regional-based personnel. The enclosed report presents the results of the inspections.

Overall your staff conducted the outage activities safely. Operators controlled plant conditions effectively and conducted a well planned and coordinated plant restart. Maintenance and surveillance activities went on properly, including the replacement of control rod drive mechanism thermal barriers to avert future slow control rod drop times and the inspection of all high pressure injection thermal sleeves and needed repairs to one. Engineering performed well, as exemplified by the identification that the power operated relief valve on the pressurizer was inoperable during the prior operating cycle and in the development and accomplishment of a modification to enhance the closure capability of the outboard reactor coolant letdown containment isolation. The inspectors also found the core flood system maintained in good material condition and that the associated design basis adequately reflected the current system operating parameters. The outage radiological controls generally met acceptable standards. Controls over the protected area boundary improved since the last outage.

Despite the overall good performance several issues developed that appeared to reflect poorly on personnel performance in the areas of operations, maintenance, and radiological controls. As such, the inspection report identifies four apparent violations that we are considering for escalated enforcement action in accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions" (Enforcement Policy), NUREG-1600. Specifically: 1) A licensed senior reactor operator directed that a reactor coolant system fill flowpath, not allowed by the governing procedure, be used to increase the fill rate. This resulted in an uncontrolled spill of water from the control rod drive mechanism vents, before the unauthorized fill path could be secured. 2) Your staff found that the pressurizer power operated relief valve had been inoperable since the last refueling outage, which ended in October 1995. This condition resulted from a wiring error and the failure to



JED11

conduct a post-maintenance test to verify operability. This issue concerned the NRC staff because of the inability to use this valve during emergency procedure evolutions, to control reactor coolant system pressure. 3) During once through steam generator tube inspections, contract personnel left a locked high radiation area boundary unlocked. This incident seemed similar to previous problems with locked area and radiological boundary controls. 4) Following work in the fuel transfer canal, after refueling, a worker became contaminated by a radioactive particle, due to an apparent failure to conduct detailed surveys and take actions to control the spread of radioactive particles. Accordingly no Notices of Violation are presently being issued for these inspection findings. In addition, please be advised that the number and characterization of these apparent violations may change because of further NRC review.

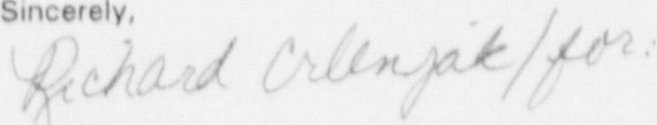
A predecisional enforcement conference (conference) to discuss the apparent violations has been scheduled for December 15, 1997. The decision to hold a conference does not mean that the NRC has determined that violations have occurred or that enforcement action will be taken. This conference is being held to obtain information to enable the NRC to make an enforcement decision, such as a common understanding of the facts, root causes, missed opportunities to identify the apparent violations sooner, corrective actions, significance of the issues, and the need for lasting and effective corrective actions. In addition, the conference will be an opportunity for you to point out any errors in our inspection report and for you to provide any information concerning your perspective on 1) the severity of the apparent violations, 2) the applicability of the factors that the NRC considers when it determines the amount of a civil penalty that may be assessed in accordance with Section VI.B.2 of the Enforcement Policy, and 3) any other application of the Enforcement Policy to these cases, including the exercise of discretion in accordance with Section VII.

At the conference we would also like to discuss the Unresolved Item dealing with your management's decision to enter the mid-loop condition with only one means of decay heat removal available. While allowed by the Technical Specifications, this evolution appeared to reflect a poor safety interpretation of the bases for the Technical Specifications and poor minimization of shutdown risk.

Following the conference we will advise you by separate correspondence of the results of our deliberation on these matters. No response regarding these apparent violations is required at this time.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room (PDR).

Sincerely,

Handwritten signature of Richard C. Crenjak in cursive script, followed by a forward slash and the word "for:".

Charles W. Hehl, Director
Division of Reactor Projects

Mr. James Langenbach

3

Docket No.: 50-289

License No.: DPR-50

Enclosure: NRC Inspection Report No. 50-289/97-09

cc w/encl:

J. C. Fornicola, Director, Nuclear Safety Review

M. J. Ross, Director, Operations and Maintenance

D. Smith, PDMS Manager

TMI-Alert (TMIA)

M. Laggart, Manager, TMI Regulatory Affairs

E. L. Blake, Shaw, Pittman, Potts and Trowbridge (Legal Counsel for GPUN)
Commonwealth of Pennsylvania

Distribution w/encl:

Region I Docket Room (with concurrences)

Nuclear Safety Information Center (NSIC)

PUBLIC

NRC Resident Inspector

H. Miller (RA)/W. Axelson, ORA

T. Kenny, DRS

P. Eselgroth, DRP

D. Haverkamp, DRP

N. Perry, DRP

A. Linde, DRP

Distribution w/encl (VIA E-MAIL):

W. Dean, OEDO

P. Milano, NRR, PDI-3

B. Buckley, PM, NRR, PDI-3

L. Thonus, NRR

S. Weiss, NRR

R. Correia, NRR

F. Talbot, NRR

DOCDESK

Inspection Program Branch, NRR (IPAS)

DOCUMENT NAME: G:\BRANCH7\TMI\IR97-09

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure "N" = No copy

OFFICE	RI/DRP		RI/DRP	E	RI/ORR		RI/DRP
NAME	Schwartz		Eselgroth		Walker		Hehl
DATE	11/26/97		11/26/97	12/2	12/1/97	12/1	12/2/97

OFFICIAL RECORD COPY