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August 22, 1997  
6710-97-2374

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

Dear Sir:

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Reply to Notice of Violation (NOV) 97-07-01

Enclosed is the GPU Nuclear reply to Notice of Violation 97-07-01 which cited GPU Nuclear for failing to comply with the requirements of 10 CFR 50.73 in the submittal of LER 97-03.

Please contact J. Schork, TMI Licensing at (717) 948-8832 should you have any questions regarding this response.

Sincerely,

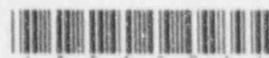
James W. Langenbach  
Vice President and Director, TMI

JSS

Attachment

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

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Notice of Violation 97-07-01

During an NRC inspection, conducted April 28, 1997, through May 16, 1997, the inspectors identified a violation of NRC requirements. According to the "General Statement of Policy and Procedure for NRC Enforcement Actions," (60 FR 34381; June 30, 1995) the violation is listed below:

- A. 10 CFR 50.73.b.(2).(i), requires within a Licensee Event Report, "A clear, specific, narrative description of what occurred so that knowledgeable readers conversant with the design of commercial power plants, but not familiar with the details of a particular plant, can understand the complete event."

Contrary to the above, on April 30, 1997, Licensee Event Report (LER) 97-03, did not contain a clear, specific, narrative description of what occurred in that LER:

- (a) Did not fully describe that overpressurization of the makeup pump suction piping was a long-standing problem dating back to 1991.
- (b) Did not relate the fact that multiple pressurizations apparently occurred. The LER indicated that instrumented tests had been done, but did not describe the tests nor the repeated failures of gages, in any detail.
- (c) Failed to address the design basis implications for potential overpressurization of the suction piping.

The above is Severity Level IV Violation (Supplement I).

GPU Nuclear Response to Notice of Violation 97-07-01

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

I. Reason for the Violation

The violation occurred due to a lack of complete understanding of the information required for the submittal of a Licensee Event Report (LER). 10 CFR 50.73 provides requirements for the contents of an LER and NUREG 1022 provides supplemental guidance on how the requirements are to be met.

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

As an interim action, guidance on the requirements of 10 CFR 50.73 and information provided by NUREG 1022 is being provided to preparers of Licensee Event Reports

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

Guidance for the preparers of Licensee Event Reports will be formalized and included as procedural guidance by December 31, 1997.

A supplement for LER 97-03 is in preparation and will be submitted to the NRC no later than September 30, 1997. The supplement will improve the clarity of the LER and will specifically address in detail:

- (a) That overpressurization of the makeup pump suction piping was a long-standing problem dating back to 1991.
- (b) That multiple pressurizations apparently occurred and will describe the tests and the repeated failures of the Bourdon tubes and pressure gages.
- (c) The design basis implications for potential overpressurization of the suction piping

IV. Date of Full Compliance

Full compliance with the requirements of 10 CFR 50.73 for Licensee Event Reports that will be submitted in the future has been achieved because of the interim action taken to date. Full compliance in terms of LER 97-03 will be achieved no later than September 30, 1997, when the supplement to the LER has been submitted. The incorporation of the requirements of 10 CFR 50.73 into a formal site procedure will be completed by December 31, 1997.