

JUL 29 1987

Docket/License No. 50-289/DRP-50

GPU Nuclear Corporation
ATTN: Mr. H. D. Hukill
Vice President and Director, TMI-1
P. O. Box 480
Middletown, Pennsylvania 17057

Gentlemen:

Subject: Inspection Report No. 50-289/87-08

During the period May 13 and June 8-16, 1987, Mr. R. Conte of my staff conducted a special safety inspection related to the Performance Appraisal Team (PAT) Report No. 50-289/86-14 (termed PAT II) and related Region I follow-up inspection reports as noted herein at your facility and at your corporate office. We documented the results of this inspection in the enclosed report. At the conclusion of the inspection, Mr. R. Conte summarized the inspection findings for Mr. P. Clark, you, and other members of your staff.

In this inspection, NRC Region I reviewed the PAT II findings to: (1) determine which findings are violations of regulatory requirements; and, (2) itemize other findings requiring additional licensee and NRC staff follow-up. As a result, this inspection necessarily focused on the negative aspects of the PAT II inspection. The PAT's positive observations, which were substantial, were not revisited in this inspection.

This Region I review identified an apparent violation of NRC requirements on the failure to properly document technical and safety reviews. You are required to respond to this letter; and, in so doing, you should follow the instructions in Appendix A of this letter.

The subject violation deals with the adequacy of implementation of technical and safety (T&S) review requirements primarily in the procedure/procedure change area. The new process implemented after September 1, 1986, has not yet alleviated this problem. We appreciate GPU Nuclear's interest in improving T&S review, but we are concerned that a relatively consistent level of safety review performance has not been achieved. A primary indicator of that performance is the adequacy of safety review documentation. The root causes of this problem appear to be: (1) improper implementation of related administrative controls, apparently due, in part, to weak training; (2) poor internal guidance on what are procedures described in the safety analysis report (SAR) or other licensing basis documentation; and, (3) a new T&S process which introduces terminology inconsistent with the general guidelines in technical specification section 6.

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Accordingly, in addition to following Appendix A, your response to this letter should also focus on your views on the root cause of this problem, along with what additional management controls or further action you plan to enhance performance in this area. In this regard, we encourage you to clarify and to improve your reviewer's understanding of what are to be considered "procedures described in the SAR." As described in paragraph 5.2 of the enclosed report, we encourage you to take a broad interpretation of this term. In cases where such interpretation leads to performance of safety review of relatively minor changes, we recognize that a rather short attendant evaluation may be entirely appropriate.

This letter also acknowledges our receipt and review of your letters, dated March 5 and April 2, 1987, in response to the PAT report and our Inspection Report No. 50-289/86-17, respectively. In this regard, we are: (1) rescinding one example of the failure to properly implement procedures dealing with Engineered Safeguards Actuation System (ESAS) testing (the other examples of the violation are not rescinded); and, (2) considering that the failure to carry out an alarm response procedure remains a violation of requirements.

Thank you for your cooperation in these matters.

Sincerely,

original signed by
Samuel F. Kane
b~ William F. Kane, Director
Division of Reactor Projects

Enclosures:

1. Appendix A, Notice of Violation
2. NRC Region I Inspection Report No. 50-289/87-08

cc w/encl:

G. Broughton, Operations and Maintenance Director, TMI-1
C. W. Smyth, TMI-1 Licensing Manager
R. J. McGoe, Manager, PWR Licensing
E. L. Blake, Jr.
TMI-1 OTSG Hearing Service List
Public Document Room (PDR)
Local Public Document Room (LPDR)
Nuclear Safety Information Center (NSIC)
NRC Resident Inspector
Commonwealth of Pennsylvania

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bcc w/encls:

Region 1 Docket Room (with concurrences)

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Management Assistant, DRMA (w/o encls)

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Per telcon
for

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RConte/mjd

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Editorial
change to
NOV
7/28/87

minor changes
made 7/22. Obtained
reconcurrence from R. Conte
per telcon 7/24/87
put down 7/28/87