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Writer's Direct Dial Number:

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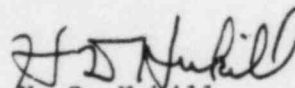
Dr. Thomas A. Murley  
Region I, Regional Administrator  
U. S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

Dear Sir:

Three Mile Island Nuclear Station, Unit 1 (TMI-1)  
Operating License No. DPR-50  
Docket No. 50-289  
Inspection Report No. 83-09  
Notice of Violation Response

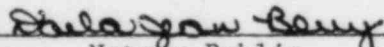
Attachments A and B to this letter are the GPUN response to Appendix A of Inspection Report 83-09, items A and B respectively.

Sincerely,

  
H. D. Hukill  
Director, TMI-1

HDH:CJS:vjf  
Attachments  
cc: R. Conte

Sworn and Subscribed to  
Before me this 13th day  
of June, 1983.

  
Notary Public

DARLA JEAN BERRY, NOTARY PUBLIC  
MIDDLETOWN BORO, DAUPHIN COUNTY  
MY COMMISSION EXPIRES JUNE 17, 1985  
Member, Pennsylvania Association of Notaries

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PDR ADOCK 05000289  
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## ATTACHMENT A

### FINDING:

10 CFR 50, Appendix B, Criterion XVI, and the GPU Nuclear Corporation Operational Quality Assurance Plan, Section 8.0, require that conditions adverse to quality be promptly identified and corrected.

Contrary to the above, as of April 1, 1983, a condition adverse to quality had not been promptly corrected in that the feeder breakers to the 1P and 1S safeguards busses had not been reset to assure that the breakers would not trip at less than the largest predicted load. The corrective action was identified in Licensee Event Report (LER) 80-001/01T-0 dated May 30, 1980. The LER stated December 1, 1980 as the completion date for the corrective action. In addition, the corrective action was not being tracked for completion prior to restart of unit operation.

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

### RESPONSE:

#### I. Corrective Steps Taken And Results Achieved

The resetting of the 1P and 1S bus feeder breakers was an active project at the time of the inspection. The planned work was not scheduled to be completed prior to December 1, 1980 or prior to restart. GPUN delayed resetting of the existing pneumatic trip units beyond December 1, 1980 since it was planned to replace them with improved qualified solid state trip units.

Failure to reset the breaker by December 1, 1980 did not result in any safety problem since the study assumed the plant was at power and an ESAS actuation occurred. In addition, failure to reset the breaker by restart could have had adverse safety impact only during a specific set of low probability events.

The existing trip units were appropriately reset under job ticket CA 837 on June 5, 1983.

#### II. Corrective Steps Which Have Been Taken To Avoid Further Violations

The action item to reset the trips was incorrectly closed under the PORC Action Item System. The PORC Action Item System is no longer in use since it has been replaced by a new system administrated by the Licensing staff. Close out of the action items now specify signoff by the responsible party, by the manager of the responsible party and by Licensing (in accordance with procedure LP-002). This tracking system should prevent occurrences of this nature.

#### III. Date When Full Compliance Will Be Achieved

Based on the above, full compliance was achieved June 5, 1983.

## ATTACHMENT B

### FINDING:

10 CFR 50 Appendix B, Criterion X, and the GPU Nuclear Corporation Operational Quality Assurance Plan, Section 6.2, require inspections of activities affecting quality to verify conformance with documented instructions.

Contrary to the above, as of April 8, 1983 adequate inspection of activities affecting quality to verify conformance with documented instructions was not conducted in that portions of piping associated with modification task LM-42, Decay Heat and Core Flood Check Valves Leak Detection System, which were required to be inspected by Administrative Procedure 1020, Revision 6, to a cleanliness level of Class B had been inspected to a lower cleanliness level of Class D.

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

### RESPONSE:

#### I. Corrective Steps Which Have Been Taken and Results Achieved

When task LM-42 piping was originally flushed, the direction of flush water flow was such that it was properly considered a cleanliness class "D" flush. The flush water was demineralized water (Grade B); however, since it was considered at that time to be a class D flush, no effluent samples were taken to verify higher cleanliness requirements.

The interconnecting piping for the modification is less than a simple configuration and as a result the flow paths for the surveillance test and the original flush were different. The flow path for the surveillance test, as described in the inspection report did result in a small portion of the Decay Heat System receiving flow from new interconnecting piping which had only been flushed to a cleanliness class "D".

GPUN (Start-Up and Testing) is currently writing a flush procedure to upgrade the core flood system/decay heat system interconnecting lines to Grade "B" requirements.

#### II. Corrective Steps Which Will Be Taken To Avoid Further Violations

As described above, this was a unique modification and as such this violation is considered to be an isolated incident. However, in order to further ensure future compliance with administrative procedure (AP) 1020, Cleanliness Requirements, flush procedures will continue to be reviewed by Plant Engineering when there is an interface with important to safety systems which connect to the reactor coolant system.

Additionally, a review of existing surveillance and operating procedures related to the subject modification will be completed to ensure compliance.

III. Date When Full Compliance Will Be Achieved

The revised flush procedure will be approved and flush completed by July 31, 1983.

The procedural review will also be completed by July 31, 1983.