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September 29, 1994
C311-94-2136

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

Gentlemen:

Subject: Three Mile Island Nuclear Station, Unit I (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Status of Corrective Action Taken for Violation 91-23-001

The purpose of this letter is to correct the record in regard to the corrective action commitment made in our response dated January 22, 1992 to the Notice of Violation 1 of Inspection Report 50-289/91-23. This action is necessary because the corrective action taken to close out the item was different than that described in GPUN's written response to the violation and no documentation is available to verify that the change in commitment was communicated to the NRC.

The Severity Level IV violation cited Technical Specification 6.8.1.a, which requires that written procedures shall be established and implemented for applicable procedures recommended in Appendix "A" of Regulatory Guide 1.22, revision 2, February 1978. Regulatory Guide 1.33, Appendix A, Section 9.a requires that maintenance that can affect the performance of safety-related equipment be performed in accordance with written procedures.

Contrary to the above, it was identified that GPUN failed to establish adequate maintenance procedures to lubricate motor-operated valves with threaded yoke bushings prior to 1989. In addition, upon establishing the program with revision 17 to Preventive Maintenance Procedure E-13 in May 1989, GPUN failed to adequately implement the procedure. This led to the eventual failure of high pressure injection discharge isolation valve MU-V16A, and the degradation of MU-V-16B, C and D.

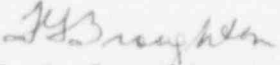
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GPUN reviewed the failure of MU-V16A and during that investigation, it was found that the stem was slightly bent. An engineering evaluation (EER 91-0378 Rev. 0) concluded that MU-V16A, with a new lubricated bushing would remain operable with the bent stem until the 10R outage, at which time the stem would be replaced. Since a maintenance job order was initiated to perform the work, action as committed to in the violation response was expected to be completed. Supplemental runout checks identified the deflection of the stem to be 0.010" through a complete open to close cycle. The results of quarterly stroke time checks and visual physical inspection performed over the past operating cycle in accordance with Surveillance Procedure 1300-3H, "IST of Makeup Pumps and Valves" continued to be acceptable. There was no indication of degradation of yoke bushing wear resulting from the stem traveling through it. The decision to replace the stem was reevaluated based on the test results and the action documented in Rev. 1 of EER 91-0378. Replacement of the stem was determined to be unnecessary and the associated job order was canceled. The condition of the valve will continue to be monitored through the performance of visual inspections in conjunction with Surveillance Procedure 1300-3H.

Reevaluation of the proposed corrective action and subsequent cancellation of the job order, although it was the correct action, resulted in the failure to meet the commitment made in the response to the violation. The NRC was not notified of the change in commitment. This letter corrects that deficiency.

The situation as described was recently discovered during the NRC OSTI. GPUN found it to result from the failure to track the original commitment with a Licensing Action Item. As a result of the incident, Licensing Engineers have been counseled on the continuing need to track all commitments to the NRC with Licensing Action Items. In addition, GPUN reviewed the tracking associated with all Notices of Violation and Licensee Event Reports since January 1991 to determine if any additional commitments had been similarly missed. No other commitments were found to have been missed.

Sincerely,


T. G. Broughton
Vice President and Director, TMI

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cc: Administrator, Region I
TMI Senior Resident Inspector