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C311-94-231?

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

Subject: Three Mile Island Nuclear Station, Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Inspection Report 94-80 - Response to Notice of Violation

Dear Sirs:

Enclosed is the GPU Nuclear response to the Notice of Violation transmitted as an enclosure to Inspection Report 94-80.

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

Sincerely,

T. G. Broughton
Vice President and Director, TMI

JSS/emf

cc: M. G. Evans - TMI Senior Resident Inspector
R. W. Hernan - Senior Project Manager
T. T. Martin - NRC Regional Administrator, Region I

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NOTICE OF VIOLATION 94-80-01

During an NRC inspection conducted on August 29 to September 16, 1994, a violation of NRC requirements was identified. In accordance with the "General Statement of Policy and Procedure for NRC Enforcement Actions," 10 CFR Part 2, Appendix C, the violation is as listed below:

Technical Specification (TS) step 6.8.1 states, in part, that written procedures shall be established and maintained covering the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1987.

Appendix A, Procedures for Performing Maintenance, Regulatory Guide 1.33, Revision 2, February 1978, states, in part, that preventive maintenance schedules should be developed to specify lubrication schedules, and inspection of equipment.

Administrative Procedure (AP) 1070, TMI-1 Maintenance Plan, Revision 8, written to comply with TS 6.8.1, established the preventive maintenance (PM) program and schedule as follows:

Step 3.1.2.1 defines PM tasks as actions taken on a routine basis to restore part or all of the failure resistance of unfailed equipment or systems, initiated as a function of time or production, regardless of the actual condition of the equipment or system.

Step 4.1.3.2 states that PM tasks shall be initiated as part of the automated generation maintenance system.

Step 4.2.3.D states that the task performance interval may be adjusted as a result of assessing the adequacy of the PM program and also as a result of reliable performance of equipment/component or satisfactory performance of PM.

Contrary to the above, on August 30, 1994, TMI-1 personnel had deferred/cancelled several PMs on safety-related motor-operated valves without prior technical justification or assessment of the adequacy of the PM program.

This is a Severity Level IV violation (Supplement 1).

GPU NUCLEAR RESPONSE TO NOTICE OF VIOLATION 94-80-01

GPU Nuclear agrees the violation occurred as stated in the Notice of Violation.

1. Reason for the Violation

The deferral/cancellation of preventive maintenance (PM) tasks on safety-related motor-operated valves without a documented technical justification or assessment of the adequacy of the PM program occurred because Step 4.2.3.D of AP 1070 was misinterpreted. The phrase "task performance interval may be adjusted" in Step 4.2.3.D was interpreted to mean that only permanent alterations to task intervals required a formal, documented assessment and that AP 1070 did not require a detailed, documented assessment for the deferral/cancellation of single PM activities. Plant personnel did evaluate the consequences of individual PM deferral/cancellations to ensure there was adequate technical justification and in some cases consulted with Plant Engineering, but did not document these evaluations.

2. Corrective Steps That Have Been Taken and The Results Achieved

On September 9, 1994, prior to the end of the OSTI inspection, the TMI Maintenance Department issued Plant Maintenance Standing Order No. 32, Revision 0, to ensure the requirements of Step 4.2.3.D are met. Standing Order No. 32 directs maintenance personnel to perform and document evaluations of deferrals of PM activities with the exception of those related to data gathering, performance monitoring, and equipment housekeeping requirements (i.e., weather station checks, ICS checks, equipment vibration monitoring). These evaluation requirements vary in level of detail based on the particular activity and on the impact of the component on the plant. Activities established for purposes of data gathering, housekeeping requirements, etc., receive a different type of evaluation than other, component specific, PM activities. Also, evaluations performed for more critical components are required to be more in-depth than those for less critical components.

3. Corrective Steps That Will Be Taken To Avoid Further Violations

A revision to Standing Order No. 32 is currently being prepared. This revision requires elevated management review and approval of long interval extensions, and requires Engineering review of interval extension evaluations on the deferral/cancellation of PM tasks associated with regulatory requirements. This revision is expected to be issued before January 1, 1995.

It is GPU Nuclear's intent to continue to utilize this Standing Order until the program is developed to the point that it is fully effective. At that time the Standing Order requirements will be incorporated into the Maintenance administrative procedures. This is anticipated to occur no later than the end of the first quarter 1995.

4. Date Of Full Compliance

Full compliance with TS 6.8.1 and AP 1070 requirements was achieved with the issuance of Standing Order No. 32. All followup actions will be completed by the end of the first quarter 1995.