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May 16, 1984
5211-84-2117

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

Dear Dr. Murley:

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

Attachment A to this letter is GPUN response to Appendix A of Inspection Report 50-289/84-02 "Notice of Violation".

Sincerely,

H. D. Hukill,
Director, TMI-1

HDH/RAS/mle

Attachment

cc: R. Conte

Sworn and Subscribed to
Before me this 16th day
of May, 1984.

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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ATTACHMENT A

FINDING:

- A. License condition 2.c(6) (Amendment No. 71, dated August 3, 1981) requires, in part, that the licensee implement an Inservice Testing Program, which satisfies the requirements of 10 CFR 50.55(a). 10 CFR 50.55a(g) requires, in part, the establishment of inservice testing for safety related valves, as further delineated in ASME Code Section XI. ASME Code Section XI, 1980 Edition, Winter Addendum, paragraph IWV-3413(a) requires that the owner (licensee) specify the limiting value of full stroke time of each power operated valve.

Contrary to the above, as of February 14, 1984, the licensee did not specify full stroke (30 degrees open) times for the Reactor Building Purge Isolation Valves AH-V1B and C, which are safety related valves, in the applicable Inservice Testing procedure.

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

RESPONSE:

- I. Corrective Steps Taken and Results Achieved.

Testing of the Reactor Building purge valves has been deleted from Surveillance Procedure (S.P.) 1300-3R and added to Surveillance Procedure (S.P.) 1300-3Q. Therefore, no action is required for S.P. 1300-3R. S.P. 1300-3Q Rev. 17 includes the correct maximum stroke closure times of <1 second for AH-V1A and D and <2 seconds for AH-V1B and C from the 30° restricted position. These maximum (restricted) stroke times agree with the updated FSAR, Section 5.3.3.2.

On January 30, 1984, (for AH-V1A/B/D) and February 12, 1984 (for AH-V1C), the purge valves were tested using S.P. 1300-3Q. Performance within the acceptance criteria for maximum stroke time was achieved.

- II. Corrective Steps Which Will Be Taken to Avoid Further Violation.

To prevent a recurrence, the IST coordinator has reviewed the IST Valve Testing Program and procedures to insure maximum stroke times are specified as required by ASME Section XI, IWV-3413(a). Several Valves have just recently been added to the IST program and these valves do not have maximum stroke times specified as yet in the surveillance procedures. Maximum stroke time limits for these valves will be specified by June 30, 1984.

- III. Date When Full Compliance Will Be Achieved.

Full compliance has been achieved for the Reactor Building purge valves as identified in this response.

FINDING:

- B. Technical Specification 6.5.2.5.d requires, in part, that the functionally assigned division (Technical Functions Division) perform independent safety reviews of events which require reporting to the NRC in writing. Technical Specification 6.5.2.7 requires that the licensee prepare, maintain, and transmit reports of these reviews to the cognizant Division Vice President.

Contrary to the above, since the effective date of these Technical Specification requirements, April 28, 1982, no independent safety reviews were performed on licensee event reports submitted to the NRC in writing; and, consequently, no reports of independent safety reviews were prepared, maintained or transmitted to the cognizant Division of Vice President.

This is a Severity Level IV Violation (Supplement I).

RESPONSE:

I Corrective Steps Taken and Results Achieved.

Licensee Event Reports from LER 82-14 of November 4, 1982, through the present, have been assigned to cognizant individuals for the performance of required Independent Safety Review. Reports of these reviews will be transmitted to the cognizant Division Vice President (TMI-1 Division) and maintained by the Licensee.

II. Corrective Steps Which Will be Taken to Avoid Further Violation.

Future Licensee Event Reports will be assigned for the performance of after the fact Independent Safety Reviews. The review will be formally tracked, the results transmitted to the cognizant Division Vice President and maintained by the Licensee. This process will be incorporated in the appropriate corporate procedure.

III. Date When Full Compliance Will Be Achieved

The appropriate past LER's have been assigned for Independent Safety Review. The review process will be controlled by procedure which will be revised to incorporate the above corrective steps by June 30, 1984.