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May 3, 1985

Office of Inspection and Enforcement
Attn: Dr. T. E. Murley
Regional Administrator
US Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

Dear Dr. Murley:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)
Operating License No. DPR-73
Docket No. 50-320
Inspection Report 85-01

Inspection Report 85-01, dated April 3, 1985, identified two (2) items of non-compliance. Attached is the GPU Nuclear response to each citation.

Sincerely,

F. R. Standerfer
Vice President/Director, TMI-2

FRS/JCA/eml

Attachments

cc: Program Director - TMI Program Office, Dr. B. J. Snyder
Deputy Program Director - TMI Program Office, Dr. W. D. Travers

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STATEMENT OF VIOLATION

The Order for Modification of License, dated July 20, 1979, as amended by the Order dated February 11, 1980, states, in part: "... Pending further amendment of the Facility Operating License, the licensee shall maintain the facility in accordance with the requirements set forth in Attachment 1 ..." (proposed Technical Specification, Appendix A to License No. DPR-73). The proposed Technical Specification 6.8.1.a states in part: "Written procedures shall be ... implemented covering ... the applicable procedures recommended in Appendix A of Regulatory Guide 1.33, Revision 2, February 1978..." Specific activities referenced in Regulatory Guide 1.33 include equipment control (e.g., locking and tagging).

Administrative Procedure 4000-ADM-3020.06, Unit Facilities Status Tagging, Revision 1, effective March 30, 1984, paragraph 4.3 requires, in part, that Do-Not-Operate tags are to be used on the component, control switch or other device which presents a condition undesirable to plant operation or which requires maintenance, repair, test, or calibration prior to resuming operation.

Contrary to the above, from September 14, 1984 through January 23, 1985, the breaker for DH-V-5A was inoperable and a Do-Not-Operate tag was not used on the device.

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

GPU NUCLEAR RESPONSE

GPU Nuclear acknowledges that the failure to place a Do-Not-Operate tag on the breaker controls for DH-V-5A represents a breakdown in the implementation of certain administrative control requirements. In this case, due to the potential personnel hazard which would have been associated with breaker closure, a Do-Not-Operate tag should have been placed on the breaker control.

In light of this condition, TMI-2 Operations personnel performed a complete review of all major plant electrical busses, Unit Substations and Motor Control Centers to determine if conditions similar to the cited condition existed elsewhere in the plant. As a result of this review, no similar condition (i.e., an open, un-tagged breaker which would represent a potential personnel hazard if operated) was identified. However, this review did identify a number of breakers which were open and were not status tagged. The majority of these breakers involved systems on the secondary side of the plant which are no longer operated. None of these identified cases involved damaged equipment.

To comply with the procedural requirements of TMI-2 Administrative Procedure 4000-ADM-3020.06, Unit Facilities Status Tagging, those breakers which correspond to shutdown systems that have been identified as open will be properly status tagged. Tags will indicate that the systems are in a shutdown condition. Action is anticipated to be completed by July 31, 1985.

STATEMENT OF VIOLATION

The Order for Modification of License, dated July 20, 1979, as amended by the Order dated February 11, 1980, states, in part: "... Pending further Amendment of the Facility Operating License, the licensee shall maintain the facility in accordance with requirements set forth in Attachment 1 ..." (proposed Technical Specifications, Appendix A to License No. DPR-73). Proposed Technical Specifications, Appendix A, Section 6.8.1, requires, in part, that "written procedures be ... implemented ... covering the activities referenced in Regulatory Guide 1.33, Appendix A, Revision 2, February 1978, and the Unit 2 Radiation Protection Plan." Specific activities referenced in Regulatory Guide 1.33 include administrative procedures, authorities and responsibilities for safe operation.

Radiological Controls Procedure 9200-ADM-4110.04, Radiation Work Permit, Section 4.22 requires, that the control point Health Physics (HP) Technician review the dose available for individuals entering Radiation Work Permit (RWP) areas.

Contrary to this requirement on February 13, 1985, the Reactor Building control point HP technician failed to check the dose available for an individual and allowed an entry into a Radiation Work Permit (RWP) area which resulted in a accrued dose in excess of GPU Nuclear administrative dose limits of 1000 mRem/quarter.

This is a Severity Level V Violation (Supplement III).

GPU NUCLEAR RESPONSE

The primary cause of this violation was an error by the Control Point technician; he failed to recognize that the worker in question had insufficient available dose to perform the assigned job without exceeding the 1000 mrem quarterly administrative dose. In response to this event, the following actions have been taken:

- . The TLD of the individual worker involved was immediately processed.
- . The Control Point technician who improperly allowed the worker to enter the Reactor Building (RB) without sufficient available dose was disciplined.
- . The Radiological Controls Reactor Building Coordinator was assigned the specific responsibility to ensure that each person entering the RB has sufficient available dose remaining to perform the assigned job. This designation of responsibility does not relieve the Control Point technician of his responsibility to check the available dose for each worker; it does provide an advance verification of available dose prior to the worker arriving at the Control Point.
- . The event was reviewed with all Group Radiological Controls Supervisors and Technicians.

- Radiological Controls Procedure 9200-ADM-4110.01, Radiation Work Permit, is being revised to add a verification space for "Required Available Exposure" to make an RWP entry. Revision of the procedure and full compliance is expected by July 1, 1985.
- In addition to the RWP procedure change, the Rems-On-Line computer system software is to be modified to "flag" a person whose authorized available exposure does not equal or exceed the, "Required Available Exposure" indicated on the Radiation Work Permit form. The target date for completion of the Rems-On-Line computer system modification is July 1, 1985.

GPU Nuclear considers that the actions taken to date are adequate to prevent recurrence of this problem. The actions planned for the future will provide an additional margin of assurance to preclude a worker from exceeding the administrative dose level.