

September 13, 1996

Mr. James Knubel
Vice President and Director, TMI
GPU Nuclear Corporation
Three Mile Island Nuclear Station
Post Office Box 480
Middletown, PA 17057-0191

SUBJECT: NRC INTEGRATED INSPECTION REPORT NO. 50-289/96-05 AND NOTICES
OF VIOLATION

Dear Mr. Knubel:

On August 3, 1996, the NRC completed an inspection at your Three Mile Island 1 reactor facility. The enclosed report presents the results of that inspection.

A continued trend related to senior reactor operators' evaluation of degraded Technical Specification equipment operability determinations and documentation warrants additional management attention. The most recent example was related to the undetected reduction of auxiliary and fuel handling building ventilation flow below the Technical Specification minimum value. The operator's excellent response to the fuse clip failure for the station blackout diesel was an example of positive performance related to the application of good self checking techniques.

Your Generic Letter (GL) 89-10 Motor-Operated Valve Program was originally scheduled for completion in June 1994. The completion date was later revised to the end of the 11R refuel outage, October 1995, following several meetings with the NRC. Despite these interactions, the program has remained substantially incomplete 18 months later, with several fundamental weaknesses, ineffective oversight, and an apparent lack of ownership. The technical inconsistencies were reflected by not just informality and poor documentation, but also weak design control and unfounded engineering assumptions. For example, valve factors - a critical design input parameter - were inadequately justified for over half of the untested valve groups. Basic assumptions related to diagnostic uncertainty and load-sensitive behavior were miscalculated or improperly estimated; and, for several valve families with marginal capability, such as the pressurizer power operated relief valve block valves and several secondary side isolation valves, the design-basis assumptions were unclear and inconsistent with respect to the current TMI licensing basis. The NRC was unable to close the TMI MOV program, margins for certain valves remain relatively small, and design-basis capability has not been adequately verified by GPUN.

Based on the results of this inspection, certain of your activities appeared to be in violation of NRC requirements, as specified in the enclosed Notice of Violation. The failure to

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establish proper design control measure, when determining valve factors, is being cited as a violation of NRC requirements.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. Your response may reference or include previous docketed correspondence, if the correspondence adequately addresses the required response. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosures will be placed in the NRC Public Document Room. To the extent possible, your response should not include any personal privacy, proprietary, or safeguards information so that it can be placed in the PDR without redaction.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, Public Law No. 96.511.

We appreciate your cooperation.

Sincerely,

ORIGINAL SIGNED BY:

Peter W. Eselgroth, Chief
Projects Branch No. 7
Division of Reactor Projects

Docket No.: 50-289
License No.: DPR-50

Enclosures:

1. Notices of Violation.
2. NRC Inspection Report No. 50-289/96-05
3. NRC/GPU Nuclear Management Meeting Presentation Slides

cc w/encl:

E. L. Blake, Shaw, Pittman, Potts and Trowbridge (Legal Counsel for GPUN)
Commonwealth of Pennsylvania
J. C. Fornicola, Director, Licensing and Regulatory Affairs
M. J. Ross, Director, Operations and Maintenance
TMI-Alert (TMIA)
J. S. Wetmore, Manager, TMI Regulatory Affairs

Mr. James Knubel

3

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