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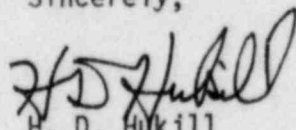
Dr. Thomas E. Murley
Region I, Regional Administrator
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, Pa. 19406

Dear Dr. Murley:

Three Mile Island Nuclear Station Unit 1 (TMI-1)
Operating License No. DPR-50
Docket No. 50-289
Notice of Violation for Inspection Report 85-22

Attached to this letter is the GPUN response to Appendix A of Inspection Report 50-289/85-22, "Notice of Violation."

Sincerely,


H. D. Hukill
Director, TMI-1

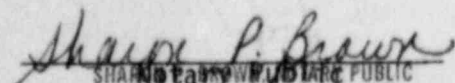
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cc: R. Conte
J. Thome

Attachment

8512040191 851126
PDR ADOCK 05000289
Q PDR

Sworn and Subscribed
to before me this 26th
day of November, 1985.


SHARON P. BROUWER, PUBLIC
MIDDLETOWN BORO, DAUPHIN COUNTY
MY COMMISSION EXPIRES JUNE 12, 1989
Member, Pennsylvania Association of Notaries

GPU Nuclear Corporation is a subsidiary of the General Public Utilities Corporation

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NOTICE OF VIOLATION

As a result of the inspection conducted during September 16 - October 11, 1985, and in accordance with the NRC Enforcement Policy (10 CFR 2, Appendix C published by Federal Register Notice 49 FR 8583, dated March 8, 1984), the following violation was identified:

Technical Specification 6.8.1 requires, in part, that procedures be implemented. The criteria listed in Maintenance Procedure 1401-18, Revision 0, June 3, 1985, "Equipment Storage Inside Class 1 Buildings," Enclosure 1, Section 3, states in part, "Equipment on rollers shall always be restrained.... Safe distance of any NSR/ITS [nuclear safety related/important to safety] equipment from unrestrained objects....shall be at least twice the height of the object all around....Scaffolding....shall be removed or seismically anchored...."

Contrary to the above as of October 5, 1985, scaffolding on unlocked roller wheels was in the diesel generator radiator room in a Class 1 building, at an unsafe distance of less than twice the height of the scaffold from the A diesel radiator (NSR equipment) and the scaffolding was not restrained or seismically anchored.

RESPONSE TO NOTICE OF VIOLATION

The scaffolding in the diesel generator radiator room was disassembled and removed from the area within 24 hours of identification of the condition.

Adequate procedural guidance existed at the time of the incident in Maintenance Procedure MP 1401-18, "Equipment Storage Inside Class 1 Buildings" and Corrective Maintenance Procedure 1440-Y-3, "Scaffolding Inspection."

The criteria from MP 1401-18, Enclosure 1, Section 3, that equipment on rollers shall always be restrained and scaffolding shall be removed or seismically anchored when the plant is in critical or operating condition were not met. The criterion that a safe distance of any NSR/ITS equipment from unrestrained objects sitting on the floor without rollers shall be at least twice the height of the object all around was also not met; however, had the criterion for seismically restraining the scaffolding been met, this criterion would not apply.

As corrective action, procedure 1440-Y-3 has been revised to require compliance with MP 1401-18 when the plant RCS temperature is above 200°F. This provides a cross reference to remind personnel that both procedures are to be complied with. A revision to 1440-Y-3 that included this change was in process at the time of the incident in response to an earlier situation involving scaffolding.

Senior Maintenance Management has advised Maintenance Department supervisors of this incident and reminded them of the necessity to follow MP 1401-18 and 1440-Y-3 to assure scaffolding is installed correctly and removed immediately upon job completion or properly secured.

Additionally, the Director, Unit 1 is in the process of briefing Operations and Maintenance personnel, especially supervisors, on the requirements for procedural compliance and the need to improve work habits and to be alert for and correct unsatisfactory or poor working conditions and practices throughout the plant. Also, the Manager, TMI Quality Assurance Mod/Ops has been requested to have the on-shift QA monitor and other QA monitoring personnel increase inspections for procedural compliance and overall performance and plant conditions outside the Control Room to identify any further problems similar to this incident.

The QA Manager will report results to the Director, TMI-1 and the Operations and Maintenance Director on a periodic basis.

The specific actions listed above shall be completed by January 1, 1986; however, continued management attention to these areas will be applied.