

APPENDIX A

NOTICE OF VIOLATION

GPU Nuclear Corporation  
Three Mile Island Unit 2

Docket No. 50-320  
License No. DPR-73

As a result of the inspection conducted on October 7, 1985 through November 8, 1985, and in accordance with the revised NRC Enforcement Policy (10 CFR 2, Appendix C), published in the Federal Register on March 8, 1984 (40 FR 8583), the following violation was identified.

- A. 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 Specifications, 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 chemical and radiological procedures prescribing the nature of sampling.

Section 2.2.3 of Procedure No. 2104-4.132, Revision 1 dated December 6, 1983, Sampling and Chemical Addition to OTSG "A", requires two valve isolation at the sample sink.

Contrary to the above, after completing Section 4.3.8, which is the final step of the procedure, two valve isolation at the sample sink is not provided.

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

- B. 10 CFR 20.201 (b) requires each licensee to make or cause to be made such surveys as (1) may be necessary for the licensee to comply with the regulations in 10 CFR, Part 20, and (2) are reasonable under the circumstances to evaluate the extent of the radiation hazards that may be present.

1000-PLN-4010.01 "Radiation Protection Plan - Unit 2" states in part, that, "Continuous sampling representative of air the person is breathing shall be performed to supplement periodic measurements during work which has the potential for the generation of significant airborne radioactivity."

9000-ADM-4020.02, "Description and Selection of Respiratory Protection Equipment," states in 4.3.1, in part, "air samples representative of the breathing zone shall be obtained during any of these activities for estimating exposure to worker."

Contrary to the above, on June 13, 1985, the licensee did not evaluate the radiation hazards incident to the presence of radioactive material at the 305' elevation of the annulus area of the Fuel Handling Building prior to and during an entry that required workers to traverse a pathway which had surface contamination; resulting in the unplanned intake of radioactive material and the assignment of 40 MPC-hr to a worker.

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

Pursuant to the provisions of 10 CFR 2.201, GPU Nuclear Corporation is hereby required to submit to this office within 30 days of the date of this Notice, a written statement or explanation in reply including: (1) the corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved for the violations. Where good cause is shown, consideration will be given to extending your response time.