November 16, 1982
4410-82-L-0050

Office of Inspection and Enforcement
Attn: Mr. Ronald C. Haynes, Director
Region I
US Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA   19406

Dear Sir:

> Three Mile Island Nuclear Station, Unit 2 (TMI-2)
> Operating License No. DPR-73
> Docket No. 50-320
> Licensee Event Report 82-033/01L-0

Attached please find Licensee Event Report 82-033/01L-0 concerning the
nonperformance of three surveillances as identified on October 14, 1982.

This event constitutes a violation of Sections 3.7.3.1, 3.7.3.2, and
3.7.3.3 and is considered reportable under Section 6.9.1.8(b) of the
Interim Recovery Technical Specifications.

Sincerely,

B. K. Kanga
Director, TMI-2

BKK/SDC/jep

Attachments

CC: Mr. L. H. Barrett, Deputy Program Director - TMI Program Office
    Dr. B. J. Snyder, Program Director - TMI Program Office
    Mr. V.   Stello, Deputy Executive Director

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NRC FORM 366
(7-77)

U.S. NUCLEAR REGULATORY COMMISSION

LICENSEE EVENT REPORT

Attachment 1
4410-82-L-0050

CONTROL BLOCK: | | | | | | | (1)   (PLEASE PRINT OR TYPE ALL REQUIRED INFORMATION)

| 0 1 | P A T M I 2 (2) 0 0 - 0 0 0 0 0 - 0 0 (3) 4 1 1 1 1 (4) | | (5)
LICENSEE CODE   LICENSE NUMBER   LICENSE TYPE   57 CAT 58

CON'T
| 0 1 | REPORT SOURCE L (6) 0 5 0 0 0 3 2 0 (7) 1 0 1 4 8 2 (8) 1 1 1 1 5 8 2 (9)
DOCKET NUMBER   EVENT DATE   REPORT DATE

EVENT DESCRIPTION AND PROBABLE CONSEQUENCES (10)

| 0 2 | On October 14, 1982, a condition determined reportable was realized. On July 14,

| 0 3 | 1982, the RCS was depressurized to allow performance of the Quick Look project. The

| 0 4 | scope of the project was expanded such that the original two week schedule has been

| 0 5 | exceeded. The extended schedule resulted in delaying performance of surveillances

| 0 6 | beyond the schedule flexibility allowed in Section 4.0.2 of the Recovery Operations

| 0 7 | Plan. This event had no effect on the health and safety of the public.

| 0 8 |

| 0 9 |

| SYSTEM CODE | C J | (11) | CAUSE CODE | A | (12) | CAUSE SUBCODE | X | (13) | COMPONENT CODE | Z Z Z Z Z Z | (14) | COMP. SUBCODE | Z | (15) | VALVE SUBCODE | Z | (16) |

(17) LER RO REPORT NUMBER | EVENT YEAR | 8 2 | | SEQUENTIAL REPORT NO. | 0 3 3 | | OCCURRENCE CODE | / | | REPORT TYPE | 0 1 | | L | | REVISION NO. | 0 |

| ACTION TAKEN | H | (18) | FUTURE ACTION | Z | (19) | EFFECT ON PLANT | Z | (20) | SHUTDOWN METHOD | Z | (21) | HOURS | 0 0 0 0 | (22) | ATTACHMENT SUBMITTED | Y | (23) | NPRD-4 FORM SUB. | N | (24) | PRIME COMP. SUPPLIER | Z | (25) | COMPONENT MANUFACTURER | Z 9 9 9 | (26) |

CAUSE DESCRIPTION AND CORRECTIVE ACTIONS (27)

| 1 0 | The cause has been identified as the failure to anticipate the need for a Recovery

| 1 1 | Operations Plan Change Request (ROPCR) as a result of the extended schedule impacting

| 1 2 | surveillance performance. ROPCR #21 was submitted on November 11, 1982. Selected

| 1 3 | departments are reviewing this event in order to ensure cognizance and avoid similar

| 1 4 | occurrences.

| FACILITY STATUS | X | (28) | % POWER | 0 0 0 | (29) | OTHER STATUS | Recovery mode | (30) | METHOD OF DISCOVERY | D | (31) | DISCOVERY DESCRIPTION | Inquiry by NRC | (32) |

| 1 5 |

| 1 6 | ACTIVITY RELEASED | Z | (33) | CONTENT OF RELEASE | Z | (34) | AMOUNT OF ACTIVITY | N/A | (35) | LOCATION OF RELEASE | N/A | (36) |

| 1 7 | PERSONNEL EXPOSURES NUMBER | 0 0 0 | (37) | TYPE | Z | (38) | DESCRIPTION | N/A | (39) |

| 1 8 | PERSONNEL INJURIES NUMBER | 0 0 0 | (40) | DESCRIPTION | N/A | (41) |

| 1 9 | LOSS OF OR DAMAGE TO FACILITY TYPE | Z | (42) | DESCRIPTION | N/A | (43) |

| 2 0 | PUBLICITY ISSUED | N | (44) | DESCRIPTION | | (45) | NRC USE ONLY

NAME OF PREPARER Steven D. Chaplin   PHONE: (717) 948-8461

LICENSEE EVENT REPORT
NARRATIVE REPORT
TMI-II
LER 82-033/01L-0
EVENT DATE - October 14, 1982

I. EXPLANATION OF OCCURRENCE

The event was the failure to perform required surveillances for three
Technical S ecification required systems. The surveillance rocedures
(systems) involved are:

* 4303-M25   Decay Heat Closed Cooling Water pump operability
                   and valve operability test

* 4303-M30A/B   Nuclear Services Closed Cooling Water pump
                   operability test and valve operability test

* 4303-Q3   Mini Decay Heat Removal pump functional test

These surveillances were initially delayed to allow continuance of the
Quick Look roject. The delay was necessary and intentional to ensure
control over potential boron dilution accidents as discussed in Appendix C
of the Quick Look Safety Evaluation submitted on July 6, 1982, via GPU
letter 4400-82-L-0110, and approved by the NRC (Dr. B. J. Snyder to
J. J. Barton dated July 13, 1982).

Following NRC approval of the Quick Look Safety Evaluation and
implementing rocedures, GPU de ressurized the RCS on July 14, 1982. Had
the RCS been re ressurized after the originally rojected two week schedule,
it would not have adversely impacted surveillance performance (i.e. delay
the surveillance testing beyond the allowed surveillance schedule flexibility
rovided in Recovery Operations Plan 4.0.2).

The surveillances have not been performed since commencement of the Quick
Look project because the procedures implementing the Quick Look Project
required that surveillances on certain systems be suspended for the duration
of the roject in accordance with the Quick Look Safety Evaluation.

This constitutes a violation of Technical Specification 3.7.3.1, 3.7.3.2,
and 3.7.3.3 and is considered reportable ursuant to Section 6.9.1.8(b)
of the Recovery Technical S ecification.

II. CAUSE OF THE OCCURRENCE

The cause of the event has been identified as the failure, on the art of
GPU, to antici ate the need for, and to submit in an expeditious fashion,
a request for a change to the Unit 2 Recovery Operations Plan once the
schedule for the Quick Look was extended such that it could adversely
impact erformance of required surveillance testing.

III. CIRCUMSTANCES SURROUNDING THE OCCURRENCE

At the time of the occurrence, the Unit 2 facility was in a long-term cold
shutdown state. The reactor decay heat was being removed via loss to
ambient. Throughout the event there was no effect on the Reactor Coolant
System or the core.

IV. CORRECTIVE ACTIONS TAKEN OR TO BE TAKEN

Recovery Operations Plan Change Request No. 21 was submitted on November 11, 1982, via GPU letter 4410-82-L-0043. It would allow suspension of surveillance testing via NRC approved procedures pursuant to Technical Specifications 6.8.2 without requiring a change to the Recovery Operations Plan.

In addition, this event is being utilized as an example to various departments in GPU to indicate the need to ensure change requests to upper tier Licensing documents are initiated as necessary. This review will be completed by November 30, 1982.

V. COMPONENT FAILURE DATA

N/A