

OCT 19 1984 BYW 311

NRC Form 366 (9-83) U.S. NUCLEAR REGULATORY COMMISSION  
 APPROVED OMB NO. 3150-0104  
 EXPIRES: 8/31/85

**LICENSEE EVENT REPORT (LER)**

191641

FACILITY NAME (1) **Three Mile Island, Unit 2** DOCKET NUMBER (2) **0500031201** PAGE (3) **1 OF 013**

TITLE (4) **Improperly Approved Procedure**

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
06	09	84	84	013	00	09	14	84			05000
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)											

OPERATING MODE (9) <b>N</b>	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) <b>01010</b>	20.406(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(c)
	20.406(a)(1)(ii)	50.36(e)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 366A)
	20.406(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.406(a)(1)(iv)	50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(ix)	

LICENSEE CONTACT FOR THIS LER (12)

NAME **Russell D. Wells, TMI-2 Licensing Engineer** TELEPHONE NUMBER **717 948-8244**

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

YES (If yes, complete EXPECTED SUBMISSION DATE)  NO

EXPECTED SUBMISSION DATE (15) MONTH **11** DAY **17** YEAR **84**

ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

On May 31, 1984, a "two-man" Temporary Change Notice (TCN) was initiated for TMI-2 Operating Procedure 2104-4.55, Revision 10, "Operation of the Reactor Building (RB) Airlock Doors", which is an NRC approved procedure. On June 1, 1984, the required two-man approval was obtained and the TCN was implemented. Subsequently on June 6, 1984, following review and approval by the remaining cognizant departments, the TCN was approved by the Site Operations Director.

Technical Specification 6.8.3.1.d requires that following approval, in this case by the Site Operations Director, the TCN must be submitted to the NRC within seventy-two (72) hours for review. However, due to an oversight by the Procedure Coordinator, the TCN was not submitted to the NRC. Consequently, since numerous entries into the RB were performed in accordance with the TCN, this constituted a condition prohibited by the Technical Specifications and is, therefore, reportable pursuant to 10 CFR 50.73(a)(2)(i)(B).

This event was discovered on August 17, 1984, during a review of Operating Procedure 2104-4.55. The actual event date was June 9, 1984, the required date for NRC approval.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Three Mile Island, Unit 2	DOCKET NUMBER (2)  0 5 0 0 0 3 2 0	LER NUMBER (6)			PAGE (3)		
		YEAR 8 4	SEQUENTIAL NUMBER - 0 1 3	REVISION NUMBER - 0 0			

TEXT (If more space is required, use additional NRC Form 366A's) (17)

I. PLANT OPERATING CONDITIONS BEFORE THE EVENT

The TMI-2 facility is in a long-term cold shutdown state. The reactor decay heat is being removed via loss to ambient. Throughout this event there was no effect on the Reactor Coolant System or the core.

II. STATUS OF STRUCTURES, COMPONENTS, OR SYSTEMS THAT WERE INOPERABLE AT THE START OF THE EVENT AND THAT CONTRIBUTED TO THE EVENT

N/A

III. EVENT DESCRIPTION

On May 31, 1984, a "two-man" Temporary Change Notice (TCN) was initiated for TMI-2 Operating Procedure 2104-4.55, Revision 10, "Operation of the Reactor Building (RB) Airlock Doors", which is an NRC approved procedure. The purpose of this "two-man" TCN was to provide additional guidance, when opening both RB airlock doors, concerning the operation of the supply dampers for RB Ventilation and Supply Fans AH-E-12 A and B (IEEE Code - VA). TMI-2 Technical Specification 6.8.3.1.a and 6.8.3.1.b state that temporary changes to NRC approved procedures may be made implement provided the intent of the original procedure control is not altered and, as in this case, the change is approved by two (2) members of the unit management staff, at least one of whom holds a Senior Reactor Operator's License. On June 1, 1984, the required two-man approval was obtained and the TCN was implemented. Subsequently, on June 6, 1984, following review and approval by the remaining cognizant departments, the TCN was approved by the Site Operations Director within the fourteen (14) day requirement of Technical Specification 6.8.3.1.c.

Additionally, Technical Specification 6.8.3.1.d requires that the TCN must be submitted to the NRC for review within seventy-two (72) hours following approval. However, due to an oversight by the Procedure Coordinator, the TCN was not submitted to the NRC. Consequently, since numerous entries into the RB were performed in accordance with the TCN, this constituted a condition prohibited by the Technical Specifications and is, therefore, reportable pursuant to 10 CFR 50.73 (a)(2)(i)(B).

This event was discovered on August 17, 1984, during a review of Operating Procedure 2104-4.55. The actual event date was June 9, 1984, which was the required date for NRC approval.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1)  Three Mile Island, Unit 2	DOCKET NUMBER (2)  0   5   0   0   0   3   2   0   8   4   -   0   1   3   -   0   0	LER NUMBER (6)			PAGE (3)		
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER			
					0   3	OF	0   3

TEXT (If more space is required, use additional NRC Form 366A's) (17)

IV. CORRECTIVE ACTIONS PLANNED

On August 30, 1984, the TCN to Operating Procedure 2104-4.55 expired and Revision 11 to 2104-4.55 was issued. This revision incorporated the TCN modifications and was approved by the NRC.

The Procedure Coordinator was counseled with respect to the nature of this event and the significance of ensuring proper and timely procedure approval. As a further corrective action, TCN's will be independently verified to ensure their compliance with the administrative requirements for obtaining the necessary reviews and approvals.

V. ROOT CAUSE OF THE EVENT

The root cause of this event was personnel error; i.e. to an oversight by the Procedure Coordinator.

VI. COMPONENT FAILURE DATA

N/A

VII. AUTOMATIC OR MANUALLY INITIATED SAFETY SYSTEM RESPONSES

N/A

VIII. ASSESSMENT OF THE SAFETY CONSEQUENCES AND IMPLICATIONS OF THE EVENT

This event had no effect on the health and safety of the public.



**GPU Nuclear Corporation**

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September 14, 1984

US Nuclear Regulatory Commission  
Document Control Desk  
Washington, DC 20555

Dear Sir:

Three Mile Island Nuclear Station, Unit 2 (TMI-2)  
Operating License No. DPR-73  
Docket No. 50-320  
Licensee Event Report 84-013

Attached is Licensee Event Report 84-013 concerning the conduct of operations with a procedure that was not approved in accordance with the administrative requirements of the TMI-2 Technical Specifications. This event was determined to be reportable on August 27, 1984.

This event is considered reportable pursuant to Title 10 of the Code of Federal Regulations, Section 50.73(a)(2)(i)(B).

Sincerely,

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

FRS/RDW/jep

Attachments

cc: Regional Administrator - Office of I & E, Dr. T. E. Murley  
Program Director - TMI Program Office, Dr. B. J. Snyder  
Deputy Program Director - TMI Program Office, Dr. W. D. Travers

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