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50-388 Susquehanna Steam Electric Station, Unit 2, Pennsylva 05000388
AUTH.NAME AUTHOR AFFILIATION
KEISER,H.W. Pennsylvania Power & Light Co.
RECIP.NAME RECIPIENT AFFILIATION
GALLO,R.M. Region 1, Ofc of the Director

SUBJECT: Responds to NRC 900105 ltr re violations noted in Insp Repts 50-387/89-01 & 50-388/89-01.

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FEB 0 5 1990

Mr. Robert M. Gallo, Chief
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SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICE OF VIOLATION
(387/89-33; 388/89-31)
PLA-3336 FILES R41-1C, R41-2

Docket Nos. 50-387
and 50-388

Dear Mr. Gallo:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation for NRC Combined Inspection Report 50-387/89-33 and 50-388/89-31 dated January 5, 1990.

The notice required submittal of a written reply within thirty (30) days of the date of the letter. We trust that the commission will find the attached response acceptable.

Very truly yours,

H. W. Keiser

Attachment

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. M. C. Thadani, NRC Project Manager

IE01
1/1

RESPONSE TO NOTICE OF VIOLATION

VIOLATION (388/89-31-01)

Technical Specification 4.0.5, specifies that inservice testing of pumps shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code.

Section XI of the ASME Boiler and Pressure Vessel Code, Article IWP-3000, Inservice Test Program paragraph IWP-3230(b) specifies that if test quantities fall within the required action range, the pump shall be declared inoperative and not returned to service until the cause of the deviation has been determined and the condition corrected.

Contrary to the above, during the performance of surveillance testing, conducted on March 28, 1989, of residual heat removal service water pump 2P506B, when the differential pressure test quantity of 77.6 PSID fell within the required action range (above the acceptance range of 65 - 71 PSID) the pump was declared operable and returned to service without the cause of the deviation being determined.

RESPONSE:

1. **Reason for the Violation If Admitted:**

   PP&L does not contest that during the performance of surveillance testing, conducted on March 28, 1989, of residual heat removal service water pump 2P506B, when the differential pressure test quantity of 77.6 PSID fell within the required action range (above the acceptance range of 65 - 71 PSID) the pump was declared operable and returned to service without a final cause of the deviation being formally determined and dispositioned. As the deviation involved a differential pressure being higher than the capability of the pump as defined in the pump's head curve, evaluations performed immediately following the Residual Heat Removal Service Water (RHRSW) system flow verification deviation determined that the pump was operable. These evaluations were consistent with the intent of the ASME Code.

The purpose of the quarterly flow verification surveillance is to determine pump degradation. High values of the performance test quantities are not indicative of pump degradation. Rather, they are indicative of instrumentation or system changes. Such anomalies warrant prompt investigation and resolution; but in no way justify any declaration of pump inoperability. PP&L will therefore submit a relief request which will allow for the cause of the deviation to be determined expeditiously as possible and either the causative condition will be corrected prior to successful completion of the affected test or else corrective action taken per IWP-3230(c).

2. <u>Corrective Steps Which Have Been Taken and the Results Achieved</u>

The flow deviation on March 28, 1989, was immediately recognized as one requiring corrective action, in accordance with ASME Code Section XI, IWP-3230(b) and (c) requirements, and the following actions were taken.

a) The subject pump remained in an inoperable status until the cause of the deviation had been determined per IWP-3230 and until the condition had been corrected by the method of analysis demonstrating that the condition did not impair pump operability and that the pump would still perform its design function.

b) The observed deviation indicated an improvement in pump performance of 400 gpm. It was confirmed that no significant work had been done to the pump since its previous test, and no physical mechanism exists for performance of the pump to improve by itself. Comparison of pump head data to the design pump curve and vibration measurements to those of previous tests confirmed the continuing good performance of the pump. PP&L therefore concluded that the pump was not the source of the deviation.

c) Test instrument calibration checks performed shortly following the test showed the instruments to be indicating accurately.

d) PP&L considers the cause of the indicated flow deviation to be attributable to possible fouling of the flow element installed inside the 26" RHRSW system piping. Our determination, however, could not be conclusively established due to the inability to drain and inspect the RHRSW system which may require the shutdown of both Unit 1 and Unit 2.

3. Corrective Steps Which Will Be Taken to Avoid Further Violations

No further action is required.

4. Date of Full Compliance

Based on the above, PP&L is in full compliance.