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 RECIP. NAME: BUTLER, W.R. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Responds to 850319 request for addl info re responses to
 Generic Ltr 83-28, Items 2, 1, 2.2.2 & 4.5.3. Testing of backup
 scram valves at refueling outage frequency added to
 preventative maint program.

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MAY 17 1985

Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO REQUEST FOR ADDITIONAL
INFORMATION ON GENERIC LETTER 83-28
ER 100450 FILE 841-2
PLA-2472

Docket Nos. 50-387
50-388

Reference: Letter, A. Schwencer to N. W. Curtis, "Request for Additional Information - Preliminary Staff Review of Generic Letter 83-28 Responses, Susquehanna Steam Electric Station", dated March 19, 1985.

Dear Mr. Butler:

Attached please find responses to the request for additional information regarding Generic Letter 83-28, items 2.1, 2.2.2 and 4.5.3 pursuant to the reference. Should you require additional information, please contact R. Woolley (215-770-7869).

Very truly yours,



N. W. Curtis
Vice President-Engineering & Construction-Nuclear

Attachment

cc: M. J. Campagnone - NRC
R. H. Jacobs - NRC

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Additional Information in Response to Generic Letter 83-28
Susquehanna Steam Electric Station Units 1 and 2

Item 2.1 (part 2) - Incomplete

Licensee needs to describe how his vendor technical information interface program will be extended to include interfaces with all vendors of reactor trip system components, show how the division of responsibility between nuclear and non-nuclear divisions of vendors and licensee is handled, and verify that lists of vendor information and the information itself is available at the reactor site for audit.

Response: As stated in our original response, the SSES reactor protection (trip) system was supplied by General Electric Company. Consequently, we rely on our excellent interface with General Electric as a continuing source of vendor information related to all reactor protection system components.

In addition, for those reactor protection system components which were not originally manufactured by GE, we supplement the GE interface with the vendor interface program described in our response to item 2.2.2. The above programs provide for continuing vendor interface with both nuclear and non-nuclear divisions of vendors.

We hereby verify that lists of vendor information (Installation, Operating and Maintenance Manuals; and Industry Event Review Program Reports) and the information itself is at the SSES site and available for audit.

Item 2.2.2 - Incomplete

Licensee needs to present his evaluation of the NUTAC program and describe how his current program will be modified and supplemented to incorporate it bearing in mind that the staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility.

Response: The vendor equipment technical information program (VETIP) as defined in the March 1984 NUTAC document is considered a valid response to Section 2.2.2 of the NRC Generic Letter 83-28. PP&L's implementation of the program is described in Attachment A. Accordingly, it is requested that the NRC reanalyze and reconsider your request for additional information.

Item 4.5.3 - Incomplete

Licensee needs to provide description and evaluation of BWROG's analysis of proposed on-line testing intervals. This information should have considered the concerns of sub-items 4.5.3.1 to 4.5.3.5 of the generic letter, show how the intervals result in high reactor trip system availability, and present appropriate Technical Specification changes for staff review.

Response: PLA-2451, "Response to Request for Additional Information Generic Letter 83-28, Item 4.5.3", dated April 12, 1985, formally endorsed the BWR Owners' Group response to this item. The BWR Owners' Group report considers application of the generic results to specific plant applications in Section 4.7. The report generically demonstrates that the current on-line functional testing intervals are adequate. This conclusion is applicable to Susquehanna.

The concerns of sub-items 4.5.3.1 to 4.5.3.5 of generic letter 83-28 were addressed in the BWR Owners' Group report. The following paragraph, excerpted from page 2-1 of the report, specifically addresses those concerns:

"The relay RPS failure frequency was determined to be $4.6E-06$ /year, which is low compared to other published values (Section 4.6.1). This result was insensitive to changes in individual component failure rates, reduced redundancy during testing and "wearout" caused by testing. But it was found to be sensitive to the likelihood of common cause failure and human errors that can disable the scram contactors. However, even with the upperbound values for these failures rates, the RPS failure frequency was still determined to be low compared to the published values. Therefore, it is concluded that this low RPS failure frequency, which is based on the current on-line functional testing intervals, demonstrates the adequacy of current test intervals."

As the report demonstrates the adequacy of existing test intervals, no changes to the Technical Specifications are proposed.

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) at a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specification surveillance requirements. The licensee needs to address this conclusion.

Response: Testing of the backup scram valves at refueling outage frequency has been added to the Susquehanna SES Preventative Maintenance Program for both Unit 1 and Unit 2. We believe that this testing is inappropriate to include in technical specifications as a surveillance. Inclusion in the technical specifications is contrary to the objectives being pursued by the NRC Technical Specification Improvement Project. As such, we propose inclusion of backup scram valve testing requirements in our Preventative Maintenance Program in lieu of requesting changes to the technical specifications.

ANALYSIS OF ACTIONS REQUIRED BY NUTAC REPORT ON VENDOR EQUIPMENTTECHNICAL INFORMATION PROGRAM (3/84)

<u>NUTAC RECOMMENDATIONS</u>	<u>PP&L STATUS</u>
1) NSSS Vendor Contact A program should be in place to obtain technical information from NSSS vendor	1) Currently in compliance PP&L receives information from General Electric in the form of SILs, TILs, SALs, and AIDs
2) NPRDS Utility should actively participate in NPRDS Utilities should provide internal control of NPRDS input	2) Work in Progress PP&L actively involved with INPO Procedures are under development to address inputting to NPRDS
3) Other Vendors Utilities should contact other safety-related vendors for assistance when considered beneficial for solving an equipment problem	3) Currently in compliance This is normal practice
4) Internal Handling of ETI (Equipment Technical Information) Review incoming ETI to provide prompt warnings and timely incorporation into procedures and training Procedures should cite appropriate ETI ETI should be included in procedures and reviewed and approved with the procedure	4) Currently in compliance NDI-QA-6.2.2 "Industry Events Review Programs" & NDI-QA-15.3.10 "IOM Use and Control" NDI-QA-15.3.10 "IOM Use and Control" NDI-QA-15.3.10

NUTAC RECOMMENDATIONS

PP&L STATUS

- 5) Internal Handling of Vendor Services

Safety-related services should be provided by QA approved/qualified suppliers

Procedural and QA/QC controls should be established in the procurement document

Procurement document should specify QA/QC program to be used.

- 6) Enhancements to NPRDS

Incorporate revised reporting guidance when issued by the NPRDS Users Group

Develop internal methods to insure NPRDS reports are clear, complete, and in agreement with the published guidance

- 7) Enhancement to SEE-IN

Utilities should report errors found in ETI to INPO and other utilities via NETWORK

- 5) Currently in compliance

Vendors must be on ASQL per NDI-QA-2.4.5 "Evaluation and Approval of Suppliers of Quality Material and Service"

NDI-QA-2.4.7 "Procurement of Quality Materials and Services"

NDI-QA-2.4.7

- 6) Work in progress

Will implement when revised guidance is issued

Currently preparing procedures

- 7) Work in progress

NDI-QA-15.3.10, "IOM Use and Control," will be revised to assure compliance. NDI 6.2.4 provides vehicle