PP&L Pennsylvania Power & Light Company
Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Harold W. Keiser
Vice President-Nuclear Operations
215/770-7502

JUN 0 2 1986

Mr. Stewart D. Ebneter
Division of Reactor Safety
U.S. Nuclear Regulatory Commission
Region I
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION REPORT 50-387/86-05
PLA-2642 FILE R41-1C,R41-2 Docket No. 50-387

Dear Mr. Ebneter:

This letter provides PP&L's response to your letter of May 2, 1986 which forwarded NRC Region I Inspection Report 50-387/86-05 with Appendix A, Notice of Violation.

Your Notice advised that PP&L was to submit 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
Vice President-Nuclear Operations

Attachment

cc: Mr. R. H. Jacobs - NRC Senior Resident Inspector
Ms. M. J. Campagnone - NRC (NRR Project Manager)

IE-01

RESPONSE TO NOTICE OF VIOLATION

Violation A (387/86-05-01)

10 CFR 50.55 a (g) requires that components which are classified as ASME Code Class 1, Class 2 and Class 3 shall meet the requirements set forth in Section XI of the ASME Boiler and Pressure Vessel Code.

The ASME Boiler and Pressure Vessel Code, Section XI, 1980 Edition through Winter 1980 Addenda, in the Foreward and in Article IWA 1400, and IWB and C 2200, requires the nuclear plant owner to develop a program which will demonstrate conformance to the requirements of Section XI.

The Susquehanna, Unit 1 Inservice Inspection (ISI) Program, document ISI-T-107.0 Revision 5, states that the program complies with the requirements set forth in the Code of Federal Regulations, Title 10, Part 50, and Section XI of the ASME Boiler and Pressure Vessel Code, 1980 Edition through the Winter 1980 Addenda.

Contrary to the above as of March 14, 1986, approximately 49 ASME Class 1 and Class 2 longitudinal seam welds in the Residual Heat Removal System, the Reactor Recirculation System and the Core Spray System, which are required by Section XI, 1980 Edition through Winter 1980 Addenda to be included in the ISI program, were not included in this programs and consequently were not scheduled to receive the examinations required by ASME Section XI. Similarly, it was noted that these same welds had not been included in, and scheduled for examination during the Preservice Inspection (PSI) program, as was required by the Edition of the ASME Code governing PSI activities.

Response:

1) Corrective steps taken and results achieved:

A thorough review of all Class 1/2 stainless steel materials within the scope of the Unit 1 ISI Program was performed. The review was based on:

1) Bechtel Piping Class Sheets (M-199)
2) ITT Grinnell Spool Drawings
3) Piping Spool Documentation Packages
4) M. W. Kellogg Spool Drawings
5) Unit #1 PSI Final Report (NES)
6) Unit #1 Component Listing and ISI 10 Year Plan

This review revealed 53 longitudinal seam welds in three piping systems omitted from the Unit 1 ISI Program. Nineteen of the 53 welds identified were dispositioned as shown in Attachment 1. The remaining 34 welds were ultrasonically examined with qualified state of the art ultrasonic techniques, utilizing trained qualified inspection personnel, during the Unit 1 Second Refueling and Inspection Outage, which ended in April 1986. Due to ALARA concerns, the scope of these baseline examinations was limited to that needed to support future ISI. These inspections were conducted in accordance with applicable ISI code requirements. The longitudinal seam welds have been added to the current ISI Program for the first ten years interval. Since the PSI Program has been completed and closed, no further action is required other than performance of the baseline examinations which were completed as described above.

[illegible]

2) Corrective steps taken to prevent further violations:

PSI

This oversight was due to an inadequate review of piping material specification changes for the existence of longitudinal seams. Since other plant design documents were provided to the PSI contractor to maintain the as-built configuration, PP&L believes that further PSI violations of this nature are unlikely.

ISI

The plant configuration was again reviewed against the ISI Program for omissions and design changes. In addition, construction and materials data had been extensively reviewed for stainless steel weldments in support of IHSI and the development of an augmented inspection program for NUREG 0313. This provides assurance that similar ISI violations are unlikely in the future.

3) Date when full compliance will be achieved:

The Unit 1 ISI program is now in full compliance. For Unit 2, the appropriate reviews and required ISI baseline examinations will be completed by the end of the Unit 2 First Refueling and Inspection Outage, currently scheduled to begin in August, 1986. Other than this, no further action related to the PSI program is necessary. Unit 2 welds examined during the first refueling and inspection outage will be added to the current ISI program for the first ten year interval.

Violation B (387/86-05-02)

10 CFR 50 Appendix B, Criterion V requires that activities affecting quality be prescribed by documented instructions and be accomplished in accordance with these instructions.

Nuclear Department Instruction, NDI-QA-8.1.1, states that for follow-up of audit findings, the responsible organization shall respond, as requested by the audit report, stating the results of review and investigation. The response shall clearly state the corrective action taken or planned.

SSES Audit 85-88, dated December 16, 1986, of ISI activities, requested a written response to audit finding 85-88-01 from the Nuclear Support Group within thirty days of receipt of the audit report.

Contrary to the above, as of March 14, 1986, the Nuclear Support Group had not yet responded to NQA audit finding, 85-88-01, within the time period specified in the audit report.

Response:

1) Corrective steps taken and results achieved:

   On May 12, 1986, Nuclear Support provided a written response that established June 23, 1986 as the expected completion date for the audit finding corrective actions. Nuclear Support identified this occurrence as an isolated case. In addition, the supervisor of Staff Auditing for NQA conducted a review of the computer data base used to track audit findings. The review determined that Nuclear Support's failure to respond to audit finding 85-88-01 within the specified time was an isolated case.

2) Corrective steps taken to prevent further violations:

   Nuclear Support personnel responsible for responding to audit findings were briefed as to the importance of a timely response. NQA's Staff Auditing Supervisor issued an information and training memo to all Staff Auditing personnel reviewing this incident and the actions required to be taken for tracking overdue responses.

3) Date when full compliance will be achieved:

   PP&L is now in full compliance.

ATTACHMENT #1

OMITTED LONGITUDINAL

SEAM WELD

CORRECTIVE ACTION

SUMMARY

System	Weld I.D. Number	Description	Diameter	Exam	Remarks*
RHR					
	DCA1111-1-H	Pipe seam	6"	UT	1,3
	DCA1111-1-J	Pipe seam	6"	UT	1,3
	DCA1111-1-K	Pipe seam	6"	UT	1,3
	DCA1111-1-L	Pipe seam	6"	UT	1,3
	DCA1111-2-B	Pipe seam	6"	UT	1,3
	DCA1111-3-C	Pipe seam	6"	UT	1,3
	DCA1111-4-G	Pipe seam	6"	UT	1,3
	DCA1111-4-F	Pipe seam	6"	UT	1,3
	DCA1111-5-C	Pipe seam	6"	UT	1,3
	DCA1111-5-D	Pipe seam	6"	UT	1,3
	DCA1112-1-C	Pipe seam	6"	UT	1,3
	DCA1112-2-C	Pipe seam	6"	UT	1,3
	DCA1112-3-B	Pipe seam	6"	UT	1,3
	DCA1112-9-A	Pipe seam	6"	UT	1,3
	DCB1021-2-D	Pipe seam	6"		2,3
	DCB1021-2-C	Pipe seam	6"		2,3
	DCB1021-1-J	Pipe seam	6"		2,3
	DCB1021-1-H	Pipe seam	6"		2,3
	DBB1072-1-E	Elbow seam	24"	UT	1,3
	DBB1072-1-F	Elbow seam	24"	UT	1,3
	HBB1111-1-H	Elbow seam	20"		4
	HBB1111-1-J	Elbow seam	20"		4
Core Spray	DCA1071-1-E	Pipe seam	12"		5
	DCA1071-1-F	Pipe seam	12"		5
	DCA1071-1-G	Pipe seam	12"		5
Reactor Recirculation	DCA1411-1-C	Pipe seam	4"	UT	1,3
	DCA1411-1-D	Pipe seam	4"	UT	1,3
	DCA1411-3-E	Pipe seam	4"	UT	1,3
	DCA1411-3-F	Pipe seam	4"	UT	1,3

System	Weld I.D. Number	Description	Diameter	Exam	Remarks*
	DCA1421-1-C	Pipe seam	4"	UT	1,3
	DCA1421-1-D	Pipe seam	4"	UT	1,3
	DCA1421-3-E	Pipe seam	4"	UT	1,3
	DCA1421-3-F	Pipe seam	4"	UT	1,3
	VRRB311-4-C	Elbow seam	12"	UT	1,3
	VRRB311-4-D	Elbow seam	12"		6
	VRRB311-5-C	Elbow seam	12"	UT	1,3
	VRRB311-5-D	Elbow seam	12"		6
	VRRB311-6-C	Elbow seam	12"	UT	1,3
	VRRB311-6-D	Elbow seam	12"		6
	VRRB311-7-C	Elbow seam	12"	UT	1,3
	VRRB311-7-D	Elbow seam	12"		6
	VRRB311-8-C	Elbow seam	12"	UT	1,3
	VRRB311-8-D	Elbow seam	12"		6
	VRRB312-4-C	Elbow seam	12"	UT	1,3
	VRRB312-4-D	Elbow seam	12"		6
	VRRB312-5-C	Elbow seam	12"	UT	1,3
	VRRB312-5-D	Elbow seam	12"		6
	VRRB312-6-C	Elbow seam	12"	UT	1,3
	VRRB312-6-D	Elbow seam	12"		6
	VRRB312-7-C	Elbow seam	12"	UT	1,3
	VRRB312-7-D	Elbow seam	12"		6
	VRRB312-8-C	Elbow seam	12"	UT	1,3
	VRRB312-8-D	Elbow seam	12"		6

*REMARKS:

1.) No PSI Baseline U.T. exam performed; U.T. exam performed during Unit #1 second refueling and inspection outage.

2.) PSI not required on Class 2 piping longitudinal seam welds, only Class 2 welds in fittings required exam per 74S75.

3.) Weld added to the ISI Program.

4.) Weld is ISI Class 3; therefore, no baseline U.T. exam required.

5.) Weld does not exist per field verification. Erroneous documentation will be corrected.

6.) Weld does not exist. Elbows are of single weld construction per field verification and Crane Co. documentation.

mm/e289C:mab