



# Pennsylvania Power & Light Company

Two North Ninth Street • Allentown, PA 18101 • 215 / 770-5151

Bruce D. Kenyon  
Vice President-Nuclear Operations  
215/770-7502

MAY 24 1983

Mr. Thomas T. Martin, Director  
Division of Engineering and Technical Programs  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION  
NRC INSPECTION OF JANUARY 17-21, 1983  
REPORT NO. 50-387/83-02  
ER 100450 FILE 841-04  
PLA-1658

Docket No. 50-387

Dear Mr. Martin:

In response to additional discussions and inquiries by NRC concerning violations 387/83-02-02 and 387/83-02-03, PP&L provides the following information which supplements our previous response in PLA-1589 dated March 28, 1983.

Violation 387/83-02-02

PP&L will perform counting efficiencies for the gamma spectrometry system at three energies instead of one. The computer printouts which are used as a permanent record of results will be modified to include the activity of the standard. A separate log will be maintained until changes to the computer format are implemented (see attachment).

Violation 387/83-02-03

PP&L does not believe that Regulatory Guide 1.33, Revision 2, February 1978, was ever intended to apply to work performed offsite under contract. Generally, work is only contracted out where very specialized expertise or facilities are required to accomplish the work. This is necessary where maintaining full-time in-house capability would be prohibitively expensive and where qualified vendors are readily available to perform the work. Before using a vendor or contractor, PP&L must be convinced that he is competent and able to perform the assigned tasks. Part of the process involved in this determination includes a thorough review of the vendor's QA program and may include visits to the vendor's shop and discussions with his key people.

MAY 24 1983

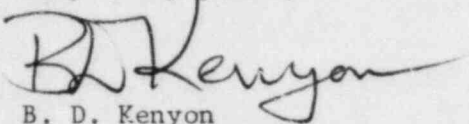
Page 2

SSES PLA-1658  
ER 100450 File 841-04  
Mr. Thomas T. Martin

Since PP&L does not agree that Regulatory Guide 1.33 applies to work performed offsite, we believe the reviews required under Technical Specification 6.8.2 are not applicable. However, PP&L is willing to perform a review of the specific procedures for effluent analyses cited in the violation. Prior to using a vendor, PP&L agrees to have a technical review of his procedures for analysis of gross alpha, tritium, Fe-55, Sr-89, and Sr-90 performed by a knowledgeable PP&L employee.

We trust the Commission will find our response acceptable.

Very truly yours,



B. D. Kenyon  
Vice President-Nuclear Operations

Attachment

cc: Mr. G. G. Rhoads  
U.S. Nuclear Regulatory Commission  
P.O. Box 52  
Shickshinny, PA 18655

Dr. J. C. Jang  
U.S. Nuclear Regulatory Commission  
631 Park Avenue  
King of Prussia, PA 19406

GE(Li) Daily Check Log

DETECTOR NO. \_\_\_\_\_

MONTH/YEAR \_\_\_\_\_

CHEMISTRY STD. NO. \_\_\_\_\_

DATE	TIME	PERCENT EFF. DEVIATION			PEAK SHIFT	PEAK SHIFT	PEAK SHIFT	FWHM
		A			@ IN(KEV)	@ IN(KEV)	@ IN(KEV)	@ KEV
		@ KEV	@ KEV	@ KEV	D	D	D	B,C
1								
2								
3								
4								
5								
6								
7								
8								
9								
10								
11								
12								
13								
14								
15								
16								
17								
18								
19								
20								
21								
22								
23								
24								
25								
26								
27								
28								
29								
30								
31								

- A. The Percent Efficiency Deviation Limit  $\leq \pm 10\%$   
 B. The FWHM Limit @ 1407 Kev  $\leq 2.8$  Kev  
 C. The FWHM Limit @ 1332 Kev  $\leq 2.6$  Kev  
 D. Peak Shift  $\leq \pm 0.8$  Kev