



Pennsylvania Power & Light Company

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Harold W. Keiser
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DEC 17 1990

Mr. James H. Joyner, Chief
Facilities Radiological Safety and
Safeguards Branch
Division of Radiation Safety and Safeguards
U.S. Nuclear Regulatory Commission
Region I
475 Allendale Road
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO NOTICE OF VIOLATION
PLA-3482 FILES R41-2/R41-1C

Docket Nos. 50-387
and 50-388

Dear Mr. Joyner:

This letter provides Pennsylvania Power & Light Company's response to the Notice of Violation, Appendix A to NRC Combined Inspection Report Nos. 50-387/90-14 and 50-388/90-14, dated November 9, 1990. This letter also provides the status of three unresolved items identified in the report.

The notice required submittal of a written reply within (30) days of the date of the letter. However, as discussed with Mr. Paul Swetland of NRC Region I on November 28, 1990, PP&L has been authorized to delay the response until December 15, 1990 due to a delay in receipt of the Inspection Report. We trust that the Commission will find the attached response acceptable.

Very truly yours,

H. W. Keiser

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

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RESPONSE TO NOTICE OF VIOLATION

VIOLATION (387/90-14-01;388/90-14-01)

Part 26.24(g) of Title 10, Code of Federal Regulation states, in part, that tests for alcohol must be administered by breath alcohol analysis devices meeting certain standards. The confirmatory test for alcohol shall be done with another breath measurement instrument. Should the person demand further confirmation, the test must be a gas chromatography analysis of blood.

Contrary to the above, the inspectors determined through review of Part 10.1.B and Part 10.2 of the licensee's Fitness-For-Duty (FFD) Manual, and through interviews with FFD program administrators, that the licensee requires a person to provide a blood specimen for a gas chromatography analysis when for-cause testing for alcohol is warranted.

RESPONSE

1. Corrective Steps Which Have Been Taken and the Results Achieved:

PP&L's FFD program and manual are being revised to specify that for individuals subject to 10CFR26, initial and confirmatory breath analysis will be used to determine blood alcohol levels and that blood gas chromatography will be used for further confirmation only upon demand by the individual being tested. Our program now reflects this. Revisions to our manuals will be completed during the first quarter of 1991.

2. Corrective Steps Which Will Be Taken to Avoid Further Violations:

The above program changes should preclude repeat violations.

3. Date When Full Compliance Will Be Achieved

PP&L's testing is now in full compliance. Conforming FFD Manual revisions will be completed during the first quarter of 1991.

**STATUS SUMMARY
UNRESOLVED ITEMS**

Unresolved Item (387/90-14-02; 388/90-14-02)

The licensee does not conduct random testing between the hours of 6:00 pm and 6:00 am. That predictable gap in scheduling diminishes the deterrent effect of random testing. This practice is not consistent with 10 CFR 26.24(a)(2).

Status

PP&L now conducts random testing between 6:00 pm and 6:00 am and on weekends and holidays. More than thirty such tests have been conducted since the NRC inspection. The FFD manual will be revised to reflect this during the first quarter of 1991.

Unresolved Item (387/90-14-03; 388/90-14-03)

The MRO has the option of not personally interviewing an individual when a positive drug test result is indicated. This option is not consistent with 2.9(c) of Appendix A to 10 CFR Part 26.

Status

As stated during the inspection, when a positive test result is indicated the MRO gives the individual an opportunity to discuss the test result before making his final determination. The FFD manual will be revised to reflect this during the first quarter of 1991.

Unresolved Item (387/90-14-04; 388/90-14-04)

The Employee Consultation Services (ECS) counselor indicated that he would not report to licensee management when he determined that a self-referred individual's condition constitutes a hazard to the individual, others, or the nuclear facility. No such cases had been encountered. However, this position is not consistent with 10 CFR 26.25.

Status

The ECS counselors have indicated that they will report to PP&L management if they determine that an individual's condition constitutes a hazard to the individual, others, or the nuclear facility. The FFD manual will be revised to reflect this during the first quarter of 1991.