



Pennsylvania Power & Light Company

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Norman W. Curtis
Vice President-Engineering & Construction-Nuclear
215 / 770-5381

May 12, 1982

Mr. Richard W. Starostecki, Director
Division of Resident and Project Inspection
U. S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

SUSQUEHANNA STEAM ELECTRIC STATION
NRC INSPECTION OF MARCH 8 - APRIL 7, 1982
REPORT NO. 50-387/82-08
ER 100450 FILE 840-4
PLA-1083

Dear Mr. Starostecki:

Reference is to your letter of April 8, 1982 which forwarded IE Inspection Report No. 50-387/82-08 and "APPENDIX A, NOTICE OF VIOLATION."

Your letter advised that PP&L was to submit within thirty (30) days of the date of the Notice, a written reply addressing (1) corrective steps which have been taken and the results achieved; (2) corrective steps which will be taken to avoid further violations; and (3) the date when full compliance will be achieved.

The "NOTICE OF VIOLATION" cites two (2) violations. The violations are stated below and each is followed by its corrective action response:

A.1 Violation:

10 CFR 50 Appendix B Criterion V and Susquehanna Preliminary Safety Analysis Report Appendix D Section 2.5 require activities affecting quality to be prescribed by and accomplished in accordance with documented and appropriate instructions, procedures, or drawings. Reactor Protection System Pre-operational Test Procedure P58.1, Revision 2, Step 79 requires adjustment of the Average Power Range Monitor (APRM) power test potentiometer to obtain an upscale trip and reporting of the meter reading at the trip point.

Contrary to the above, on March 9, 1982, a technician performing Procedure P58.1 Step 79 properly obtained an upscale trip and then improperly adjusted APRM Gain Potentiometer R-16 to make the meter reading correspond to the specified trip setpoint before reporting the meter reading, thereby, providing false indication of the trip setpoint and invalidating the APRM calibration.

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Response:

(1) Corrective Action Taken and the Results Achieved:

Appropriate administrative control mechanisms were utilized to identify the deficiency in the preoperational test records and to correct the deficiency by recalibration of the APRM Upscale Trip channels. Documentation of this recalibration was completed on April 20, 1982.

(2) Corrective Action Taken to Avoid Further Violations:

This incident occurred as a result of miscommunication between the Test Director and the I&C technician assisting him during the performance of the test. To prevent recurrence of this violation, Test Directors will attend a training session to be held prior to May 31, 1982, which will include a briefing on Section 5.2.1 of AD 7.7, Rev. 3 'Test Briefing'. The technician involved in the incident was counseled, and a briefing on the violation was held at a section meeting of I&C Technicians. The importance of following appropriate administrative control mechanisms for dealing with deviations from established procedures was stressed during this briefing.

(3) Date When Full Compliance Will be Achieved:

Full compliance was achieved upon completion of the recalibrations of the APRM channels.

A.2 Violation:

10 CFR 50 Appendix B Criterion II requires that the Quality Assurance Program be documented by and carried out in accordance with written policies, procedures, or instructions; that the major organizations participating in the program and their designated functions be identified, and that activities affecting quality be controlled consistent with their importance to safety. Susquehanna Facility Safety Analysis Report (SFAR) Section 13.5.1.2 states that safety-related procedures are reviewed by the Plant Operations Review Committee (PORC) and approved by the Superintendent of Plant as described in FSAR Section 13.4. FSAR Sections 13.4.1.3 and 13.4.1.4 states that the PORC is responsible for reviewing procedures that affect nuclear safety and for submitting PORC approved procedures to the Superintendent of Plant for approval.

Contrary to the above, the Standby Gas Treatment System operating procedure, OP-70-001, Revision 0, was approved by the Superintendent of Plant on January 14, 1982 without PORC review and submission for approval.

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Response:

(1) Action Taken and Results Achieved:

PP&L does not agree that the described circumstances represent a violation of NRC requirements and requests that the item be withdrawn.

As discussed with the inspectors who identified this item, PP&L maintains that no regulatory requirement was violated during the approval of OP-70-001, "Standby Gas Treatment System." PP&L believes that the inspector's concern stems from an internal NRC position paper which has no regulatory basis for SSES.

Administrative procedure AD-QA-101, "Procedure Program", defines the process by which plant procedures are reviewed and approved. AD-QA-101 provides for the review of procedures by a quorum of PORC members via a documented routing/comment/resolution process.

The procedure referenced in the Notice of Violation, OP-70-001, did receive a PORC review via the routing/comment/resolution process described above prior to approval by the Superintendent of Plant. Since this review was conducted in compliance with approved plant procedures and FSAR commitments, we conclude that the PORC review of OP-70-001 did not constitute a violation of NRC regulations and, therefore, no corrective action has been taken.

(2) Corrective Action Taken to Avoid Further Violations:

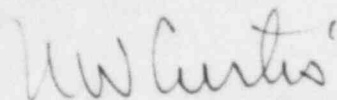
PP&L considers the methods for PORC review of procedures, as stated in AD-QA-101, to be in compliance with NRC regulations. PP&L is submitting Section 6 of the Plant Technical Specifications which contain the requirements for PORC reviews of Plant Procedures. This submittal requires PORC reviews only for Administrative Procedures. Technical procedures will be independently reviewed by individuals competent in the areas addressed by the procedure. Based on conceptual discussions with NRC, PP&L anticipates approval of this submittal.

(3) Date When Full Compliance Will be Achieved:

By adhering to AD-QA-101, PP&L has achieved full compliance with expected requirements.

We trust the Commission will find our response to be satisfactory.

Very truly yours,



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

JS:sab
Attachment

cc: Mr. Gary G. Rhoads
U. S. Nuclear Regulatory Commis-
sion
P.O. Box 52
Shickshinny, PA 18655

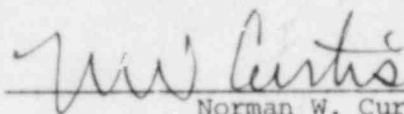
AFFIDAVIT

COMMONWEALTH OF PENNSYLVANIA)

: SS

COUNTY OF LEHIGH)

I, NORMAN W. CURTIS, being duly sworn according to law, state that I am Vice President, Engineering & Construction-Nuclear of Pennsylvania Power & Light Company and that the facts set forth on the attached response by Applicants to the NOTICE OF VIOLATION dated April 8, 1982 are true and correct to the best of my knowledge, information and belief.

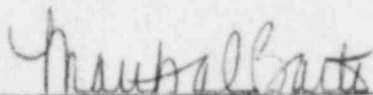


Norman W. Curtis

Vice President,

Engineering & Construction-Nuclear

Sworn to and subscribed
before me this twelfth day
of May, 1982



Notary Public

MARTHA C. BARTO, Notary Public

Allentown, Lehigh County, Pa.

My Commission Expires Jan. 13, 1986