



Pennsylvania Power & Light Company

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Bruce D. Kenyon
Vice President-Nuclear Operations
215 / 770-4378

December 23, 1982

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

SUSQUEHANNA STEAM ELECTRIC STATION
COMBINED NRC RESIDENT INSPECTION
SEPTEMBER 8 - OCTOBER 19, 1982
REPORT NOS. 50-387/82-32 & 50-388/82-05
ERs 100450/100508 FILE 840-4

PLA-1451

Dear Mr. Starostecki,

Reference is to your letter of November 23, 1982, which forwarded combined IE Inspection Report Nos. 50-387/82-32 & 50-288/82-05 and "APPENDICES A and B, NOTICE OF VIOLATION."

Your notice advised that PP&L was to submit within thirty (30) days of the date of the letter, a written reply addressing (1) the 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.

Appendix B "NOTICE OF VIOLATION" cites one (1) violation which is stated in the attachment to this letter and is followed by its corrective action response.

The violation and its response included in the attachment to this letter contain Safeguards Information and should be protected pursuant to the provisions 10 CFR 73.21. This letter with the attachment removed does not contain safeguards information and may be placed in the Public Document Room.

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

A. Violation:

The Susquehanna Preliminary Safety Analysis Report, Appendix D, Section 3.3.11 requires materials and equipment in the field to be stored in accordance with approved procedures. Bechtel Field Procedure, FP-G-11, "Procedure for Storage, Protection, Maintenance and Lay-up," Paragraph 2.3, requires that specified caps, plugs or closures be kept in place on all piping and pipe fittings, and that stainless steel piping stored outside shall be covered with approved tarps with adequate air circulation.

Contrary to the above, on October 7, 1982, carbon steel piping stored outside behind the piping combination shop was found internally rusted without protective caps or closures, and stainless steel piping was found uncapped and not covered with a tarp. Some of this piping was color-coded for safety related use.

Response:

(1) Corrective steps which have been taken and results achieved:

- a) Bechtel NCR 9780 was issued on 10/7/82 to document the discrepant conditions observed by the NRC and to obtain corrective action.
- b) Equipment Maintenance Requirements and Record (EMRR) No. 2220.1.3011 was initiated on 10/8/82 to require a formal monthly review of storage conditions in this area by Bechtel Quality Control and Bechtel Field Engineering.
- c) Bechtel Quality Control conducted a training class for Bechtel QC personnel on 10/12/82 to discuss storage/maintenance requirements and to reaffirm prevention of inadvertent use of materials exhibiting evidence of improper storage.
- d) An interim memo to Bechtel Field Procedure, G-11, clarifying storage/maintenance requirements contained therein, was issued on 11/3/82. This memo delineated the requirement for segregation of carbon steel and stainless steel materials.
- e) The Bechtel Field Construction Manager issued a memo on 11/15/82 to all superintendents, assistant project field engineers, and lead engineers emphasizing requirements for storage and maintenance of permanent plant materials and equipment.
- f) Bechtel Field Engineering has included the piping combination shop area in their daily storage and maintenance walkdown program as defined in Field Procedure, G-11. Inclusion of this area became effective 11/29/82.

- g) Bechtel Quality Assurance reviewed storage conditions in the piping combination shop area on 12/13/82 and found them to be satisfactory.

- (2) Corrective steps which will be taken to avoid further violations:

The need for maintaining proper storage conditions for piping and hanger material was discussed in a training session given by the Bechtel lead field engineer of the storage and maintenance group for Bechtel Field personnel working in other disciplines. This training session was conducted on December 17, 1982.

- (3) Date when full compliance will be achieved:

Full compliance will be achieved upon closure of Bechtel NCR 9780 which is scheduled for December 29, 1982.

B. Violation:

The Susquehanna Steam Electric Station Unit 1 Technical Specifications Section 3.3.7.9 required a minimum of one operable ionization fire detector in fire zone 1-7B, and one operable heat detector in fire zone 0-27E.

Contrary to the above, as of October 20, 1982, no ionization fire detectors were located in fire zone 1-7B, and on October 15, 1982, the licensee could not provide surveillance data to demonstrate that heat detectors in fire zone 0-27E were operable.

Response:

- (1) Corrective steps which have been taken and results achieved:

- (a) An hourly fire patrol was established as required by Technical Specifications to compensate for the lack of ionization detectors in fire zone 1-7B.

A review of plant design requirements was undertaken. This review revealed that there is no equipment required for safe shutdown in zone 1-7B and therefore ionization detectors are not required in this zone.

- (b) When it was determined that the testing required for heat detector circuitry following maintenance could not be varified, the heat detectors in Zone 0-27E were declared inoperable. Subsequently the detectors were functionally tested and returned to service. These detectors are included in surveillance procedure SI-13-201 which assures that they will be tested on a routine basis.

- (2) Corrective steps which will be take to avoid further violations:

- (a) A technical specification change has been prepared to delete the requirement for ionization detectors from zone 1-7B.
- (b) The individuals involved with the failure to comply with the Work Authorization (WA) testing requirements were instructed on the necessity to perform and document all testing specified on the WA form.

In an effort to determine and rectify inconsistencies concerning the fire detection system, PP&L reviewed the as-built condition, the Fire Protection Review Report (FPRR), and the Technical Specifications. The results of these reviews will determine the necessary corrective action including Technical Specification changes, FPRR revision, and Plant Modification Requests.

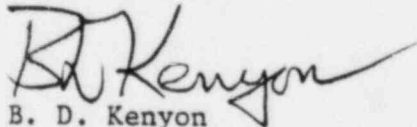
(3) Date when full compliance will be achieved:

- (a) The Technical Specification Change deleting the requirement for ionization chambers in zone 1-7B is scheduled to be submitted to the commission by January 10, 1983. Full compliance will be achieved upon NRC review and acceptance of this change.
- (b) Full compliance was achieved when the detectors in Zone 0-27E were functionally tested and determined to be acceptable.

PP&L anticipates completing the corrective actions resulting from the review of the fire protection system by January 31, 1983.

We trust the Commission will find our response acceptable.

Very truly yours



B. D. Kenyon
Vice President - Nuclear Operations

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

December 23, 1982

SSES
ER 100450/
100508

PLA-1451
FILE 840-4

Attachment

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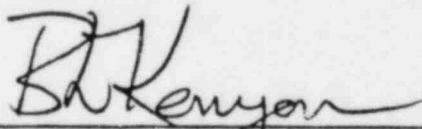
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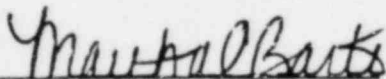
COUNTY OF LEHIGH)

I, Bruce D. Kenyon, being duly sworn according to law, state that I am Vice President-Nuclear Operations, of Pennsylvania Power & Light Company and that the facts set forth on the attached response by Applicants to the NOTICE OF VIOLATION dated November 23, 1982, are true and correct to the best of my knowledge, information and belief.



Bruce D. Kenyon
Vice President-Nuclear Operations

Sworn to and subscribed
before me this 22nd day
of December, 1982.



MARTHA C. BARTO, Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires Jan. 13, 1986