



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 20 1983

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
RESPONSE TO ENFORCEMENT ACTION 83-26
ER 100450 FILE 841-04
PLA-1673

Docket No. 50-387

Dear Mr. DeYoung:

Pursuant to 10CFR2.201, Pennsylvania Power & Light Company hereby provides the attached response to Enforcement Action 83-26. Payment in the amount of \$60,000 is enclosed.

We trust the Commission will find our response acceptable.

Very truly yours,

B. D. Kenyon
Vice President-Nuclear Operations

Attachments
Affidavit

cc: Mr. James M. Allan
Acting Regional Administrator - Region I
U.S. Nuclear Regulatory Commission
631 Park Avenue
King of Prussia, PA 19406

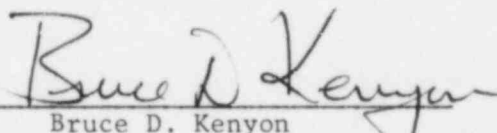
Mr. G. G. Rhoads - NRC Senior Resident Inspector

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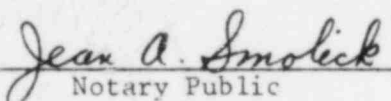
COMMONWEALTH OF PENNSYLVANIA)
: SS
COUNTY OF LEHIGH)

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 to Enforcement Action 83-26 dated April 22, 1983, 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 this 20th day
of May, 1983.



Notary Public

JEAN A. SMOLICK, Notary Public
Allentown, Lehigh County, Pa.
My Commission Expires May 14, 1984

I. RESPONSE TO VIOLATION ASSESSED A CIVIL PENALTY

1. Pennsylvania Power & Light Company admits to the violation.
2. Several factors contributed to causing the violation.
 - a. The operational effects of an electrical blocking request were not obvious based on the drawings used to generate the request. The information presented on the schematic drawing was confusing. This reduced the effectiveness of subsequent reviews by operations personnel prior to approval of the request.
 - b. The alarm response procedures which applied when the breakers were opened did not identify that both trains of the standby gas treatment system (SGTS) were then in an inoperable condition. The operating shift investigated and concluded that SGTS train "B" was operational. Subsequent operating shifts investigated the alarms and reached the same conclusion.
3. The following corrective actions have been taken to prevent further violations.
 - a. On March 3, 1983, the Supervisor of Operations issued a memo to all shift licensed personnel. This memo was required reading prior to taking over the shift. The memo (1) included a scenario of the events which led to the violation, (2) contained direction to assess the use of breakers as electrical blocking points, (3) emphasized the significance of "loss of power" annunciators, and (4) provided for a review of reportability procedures. On March 4, 1983, a followup memo was issued to all licensed personnel providing further direction on blocking practices for electrical systems.
 - b. PP&L's Nuclear Safety Assessment Group (NSAG) was requested to investigate and report on the events surrounding the violation. The report was completed on March 28, 1983, and forwarded to Mr. R. W. Starostecki of NRC Region I in PLA-1623 dated April 18, 1983.
 - c. The Supervisor of Operations conducted training sessions with each shift to ensure that all significant aspects of the event were discussed and understood.
 - d. The Supervisor of Operations and Assistant Superintendent of Plant conducted daily reviews of operator logs for approximately two weeks to ensure proper use, establish acceptable standards, and to institute changes where necessary. The proper use of shift turnover sheets was also reemphasized. An upgrade in the quality of shift log entries has been achieved.
 - e. Administrative Procedures AD-QA-502, "Work Authorization System," and AD-QA-306, "System/Equipment Release," have been revised to require that individuals who prepare electrical/instrument blocking requests must identify in writing any equipment affected and any operational impacts of the request.

- f. The Plant Control Operator (PCO) has been assigned responsibility to technically review electrical/instrument blocking requests and to assess the effects on system operability which would result. In addition, the Unit Supervisor is required to approve electrical/instrument blocking requests after an additional review for effects on system operability. This policy has been reviewed with the Shift Supervisors.
 - g. Plant management has reemphasized an existing station practice regarding the importance of working LCO related jobs continuously to completion.
 - h. A review of control room alarms was performed at 100% power. This review identified thirty-five "nuisance" alarms. Subsequent actions have successfully cleared fifteen of these alarms.
 - i. The two alarm response procedures for SGTS loss of control power, train "A" and train "B", have been revised to identify that when the alarm is received, the associated train is inoperable. They have also been revised to further clarify the actions to be taken. In addition, a review of other alarm response procedures identified twenty-six similar procedures regarding loss of power which may also require revision.
4. The following corrective actions to avoid further violations are in progress or planned.
- a. Administrative Procedure AD-QA-300, "Conduct of Operations," will be revised by June 17, 1983, to clearly describe the responsibilities of licensed operators regarding electrical/instrument blocking and system status control. Training will be conducted on these revisions.
 - b. Additional administrative procedures will be revised by June 30, 1983, to provide for a formal documented review of work packages, to include PCO review of electrical/instrument blocking requests for technical adequacy and effects on system operability, and Unit Supervisor review for effects on system operability prior to approval (see paragraph 3f above). These revisions will also provide for an electrical/I&C review of blocking requests. Training sessions will then be held with appropriate personnel.
 - c. The alarm response procedures identified in paragraph 3i above will be revised to clarify effects on system operability and actions to be taken. The revisions will be incorporated into licensed operator qualification/requalification training by August 30, 1983.
 - d. A review of the remaining "nuisance" alarms is in progress (see paragraph 3h above). Action will be taken to clear as many of these as possible.
 - e. Training in print reading will be incorporated into licensed operator qualification/requalification training and first cycle training will be completed by June 15, 1983.

- f. The practice of working LCO related jobs continuously to completion (see paragraph 3g above) will be incorporated into appropriate administrative procedures by June 15, 1983.
 - g. Shift turnover sheets will be revised to facilitate use and comprehension. This will be completed by June 30, 1983.
 - h. In order to enhance our ability to clearly identify safety related loads that might be affected by breaker operations, PP&L will consolidate and display this information. This information is currently available in drawings but can be much more efficiently displayed. Also, in order to assist operations and maintenance personnel in troubleshooting and maintenance activities, we are upgrading safety related electrical schematic drawings to include details such as additional cross references, details of relay coil contacts, state link and terminal location and detail, and power supplies. Our schedule for completion of all of this work is March 1, 1984.
5. Full compliance was achieved on March 1, 1983, as a result of returning both trains of SGTS to service.

II. RESPONSE TO VIOLATION NOT ASSESSED A CIVIL PENALTY

1. Pennsylvania Power & Light Company admits to the violation.
2. The cause of the violation was failure to note all applicable reporting requirements. When the operating shift recognized that both trains of SGTS had been inoperable earlier in the day, this was documented and referred to plant management in accordance with Administrative Procedure AD-QA-424, "Incident Reporting." By this time, both trains of SGTS had been demonstrated operable. The event was classified as requiring a report within twenty-four hours in accordance with Technical Specifications Section 6.9.1.8f, "Personnel error or procedural inadequacy which prevents or could prevent, by itself, the fulfillment of the functional requirements of systems required to cope with accidents analyzed in the SAR." Additional investigation was initiated in order to make as complete a report to NRC as possible. The similar one-hour reporting requirement of 10CFR50.72(a)(6) was overlooked.
3. Corrective action to prevent further violations involved giving a training course on reporting requirements to designated supervisory personnel. This training was intended to ensure a better and more broad based cognizance of reporting requirements throughout the plant organization.
4. No further actions are necessary to avoid further violations.
5. Full compliance has been achieved.

DCS

BILL FOR COLLECTION

Bill No. _____

U. S. Nuclear Regulatory Commission

Date May 25, 1983

(Department or Establishment and Bureau or Office)

Washington, DC 20555

(Address)

PAYER:

Pennsylvania Power and Light Company
2 North Ninth Street
Allentown, PA 18101

*This bill should be returned by the
payer with his remittance.*

SEE INSTRUCTIONS BELOW.

Date	DESCRIPTION	Quantity	Unit Price		Amount	
			Cost	Per		
5/25/83	Fullpayment for CP proposed 4/22/83 for EA 83-26, Docket No. 50-387.				\$60,000.00	
AMOUNT DUE THIS BILL.					\$ 60,000.00	

This is not a receipt

INSTRUCTIONS

Tender of payment of the above bill may be made in cash, United States postal money order, express money order, bank draft, or check, to the office indicated. Such tender, when in any other form than cash, should be drawn to the order of the Department or Establishment and Bureau or Office indicated above.

Receipts will be issued in all cases where "cash" is received, and only upon request when remittance is in any other form. If tender of payment of this bill is other than cash or United States postal money order, the receipt shall not become an acquittance until such tender has been cleared and the amount received by the Department or Establishment and Bureau or Office indicated above.

Failure to receive a receipt for a cash payment should be promptly reported by the payer to the chief administrative officer of the bureau or agency mentioned above.

IE-14

